



VALLEJO CITY
UNIFIED SCHOOL DISTRICT

Vallejo City Unified School District

Equity Impact Analysis Report

November 12, 2025





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INTRODUCTION

Vallejo City Unified School District is conducting an equity impact analysis (EIA) in its consideration of school closures or consolidations. While only required for school districts in State receivership pursuant to Education Code 41329, it is still recommended and viewed as a best practice by the California Attorney General. According to the California Attorney General, this law helps to “mitigate harm and ensure equal opportunity for all of our students.”¹ The Board of Education has developed a set of metrics for this EIA. Pursuant to Board Resolution No. 4080, the metrics consist of the following:

- (1) The condition of a school facility;
- (2) The operating cost of a school and the associated savings resulting from a closure or consolidation;
- (3) The capacity of a school to accommodate excess pupils;
- (4) Special programs available at the schools being considered for closure or consolidation and whether those programs will be provided at the same current level at the schools to which pupils will be diverted;
- (5) Environmental factors, including, but not limited to, traffic and proximity to freeway access;
- (6) Balance of pupil demographics, including race or ethnicity, pupils with disabilities, English learners, foster youth, and homeless youth, in the schools being considered for closure or consolidation, and the resulting demographic balance of pupils after placement in other schools, in order to determine if the decision to close or consolidate will have a disproportionate impact on any particular demographic group;
- (7) Transportation needs of pupils;
- (8) Aesthetics and the opportunity for blight and negative impact on the surrounding community; and
- (9) Impact on feeder school attendance patterns with the closure of any particular school and whether the closure will attenuate attendance at other schools or specialized programs as a result.

The purpose of this EIA is to provide metrics evaluating any potential equity impacts arising from the school closures and consolidations under consideration.

There are seven (7) schools under review for possible closure or consolidation in this EIA: Cooper Elementary, Federal Terrace Elementary, John Finney Education Complex, Highland Elementary, Lincoln Elementary, Pennycook Elementary, and Steffen Manner Elementary. This EIA also considers an eighth (8th) option involving a combination of changes which would result in Federal Terrace Elementary and Lincoln Elementary being consolidated into one or more schools. To receive students from any closure or consolidation, a variety of schools are under consideration as the receiving schools. In total, sixteen (16) receiving options are reviewed in this EIA.

The options under review for this EIA are summarized in the table below.

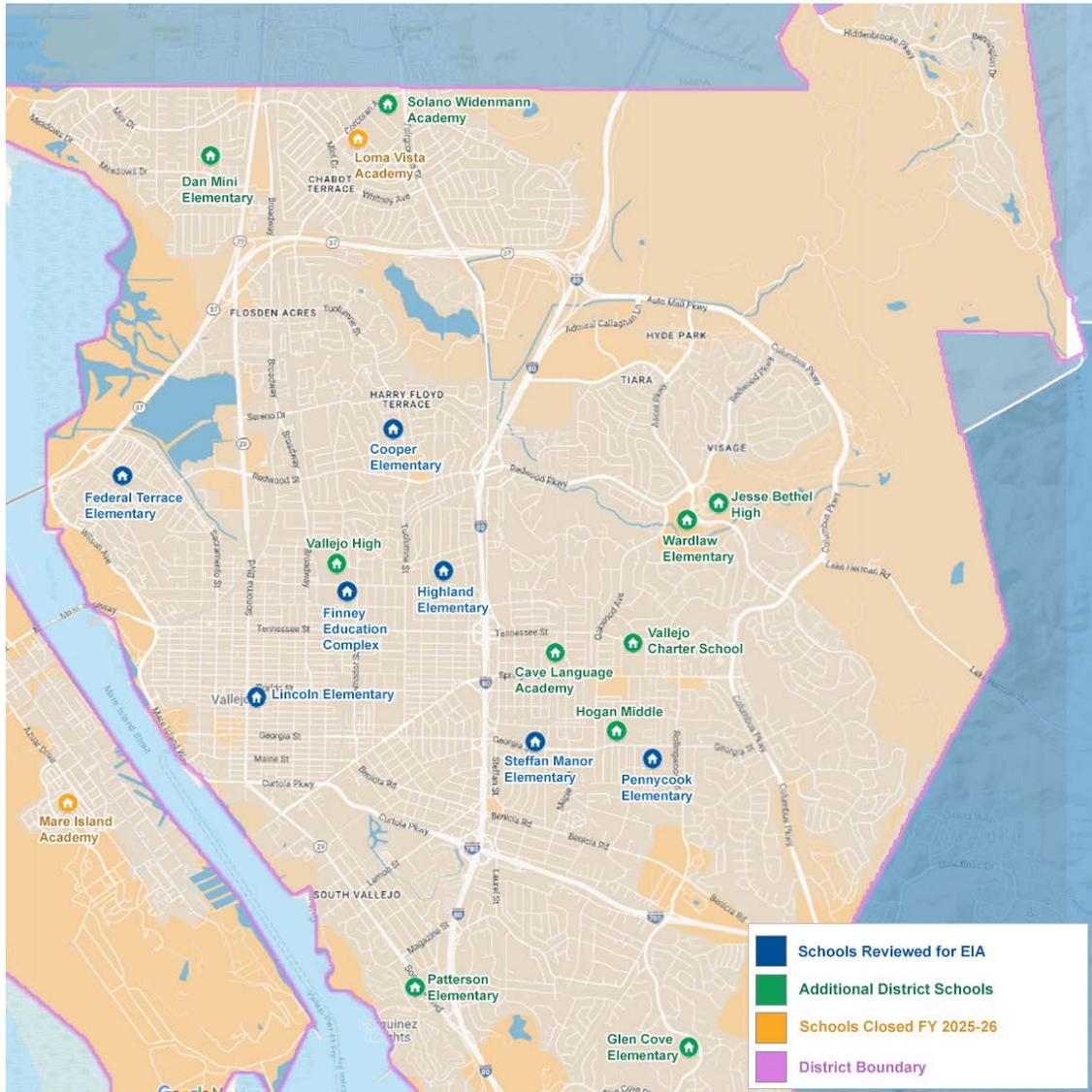
¹ State of California, Office of the Attorney General Rob Bonta, “Guidance Regarding Laws Governing School Closures and Best Practices for Implementation in California,” April 11, 2023.

Potential School Under Review		Potential Receiving School(s)
1 Cooper Elementary		Highland Elementary
2 Federal Terrace Elementary		a Lincoln Elementary (Grades TK-3) and Cooper Elementary (Grades 4-6)
		b Lincoln Elementary (Grades TK-3) and Highland Elementary (Grades 4-6)
3 Finney Education Complex		a Jesse Bethel High, or
		b Vallejo High
4 Highland Elementary		a Cooper Elementary, or
		b Cooper Elementary and Federal Terrace Elementary ¹ , or
		c Cooper Elementary and Lincoln Elementary (Grades TK-3) ²
5 Lincoln Elementary		a Cooper Elementary, and/or
		b Federal Terrace Elementary, and/or
		c Highland Elementary
6 Pennycook Elementary		Steffan Manor Elementary
7 Steffan Manor Elementary		a Pennycook Elementary, or
		b Pennycook Elementary and Highland Elementary ³
<i>Possible combination of above:</i>		
8 Federal Terrace Elementary and Lincoln Elementary		a Cooper Elementary, or
		b Highland Elementary

Notes: if students are to be received at multiple schools, attendance boundaries will be established to split students between the schools. While the attendance boundaries may be adjusted as needed, for purposes of this analysis, the following assumptions have been made:
 1) Split along Broadway St, with students residing east to attend Cooper and students residing west to attend Federal Terrace.
 2) Split along Tennessee St, with students residing north to attend Cooper and students residing south to attend Lincoln.
 3) Split along Highway 80, with students residing east to attend Pennycook and students residing west to attend Highland.

Note that if a school is under review in this EIA Report, this does not mean the school will be closed. Rather, it means that the school is under consideration as a possible option for closure or consolidation. Ultimately, any school closure or consolidation will be decided by the Board of Education with consideration of this report and community input.

Below is a map highlighting the school sites under review for this EIA as well as the other school sites operated by the District:



A desired benefit of this EIA is to evaluate whether any option under consideration would have a discriminatory impact on a demographic group. For purposes of this report, rising to the level of discriminatory involves the following findings:

- Whether the school site was selected for closure or consolidation on the basis of a particular student group
- Whether the school site, if closed or consolidated, would have a discriminatory and disproportionate impact on a particular student group
- Whether the school site, if closed or consolidated, would lead to a discriminatory, disproportionate effect on the concentration of a particular student group at the receiving school

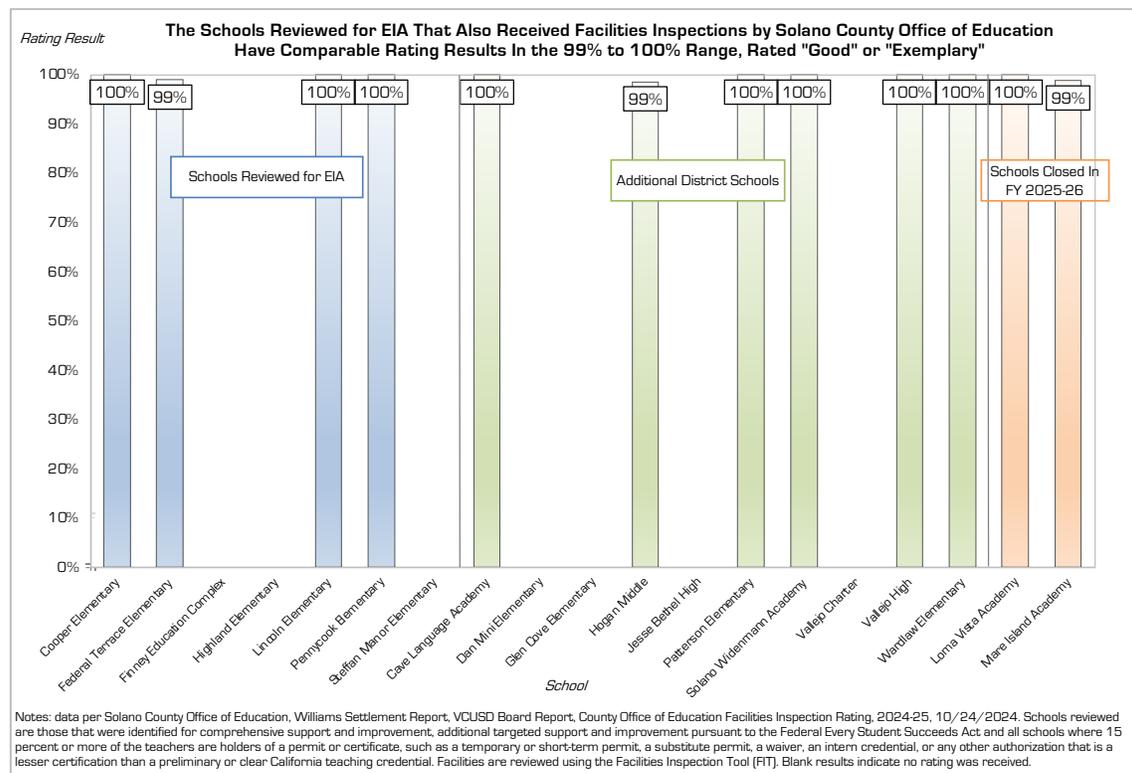
Many student groups were reviewed in this report, including students with higher needs and students based on a variety of demographics. An important conclusion that will be demonstrated is that, based on all the metrics reviewed in this EIA, none of the impacts that were identified in this report rose to the level of discriminatory.

(1) CONDITION OF SCHOOL FACILITIES

The condition of school facilities is the first metric reviewed by this EIA.

The Solano County Office of Education annually evaluates any District schools that (i) are identified for comprehensive support and improvement, (ii) are identified for additional targeted support and improvement pursuant to the federal Every Student Succeeds Act (ESSA), or (iii) all schools where fifteen percent (15%) or more of the teachers hold a permit or certificate (such as a temporary or short-term permit, a substitute permit, a waiver, an intern credential, or any other authorization) that is a lesser certification than a preliminary or clear California teaching credential.

The results of the facilities inspections for inspected schools are shown in the chart below:



Blank results in the chart above indicate the school did not meet the criteria noted above to receive a facilities condition inspection and rating.

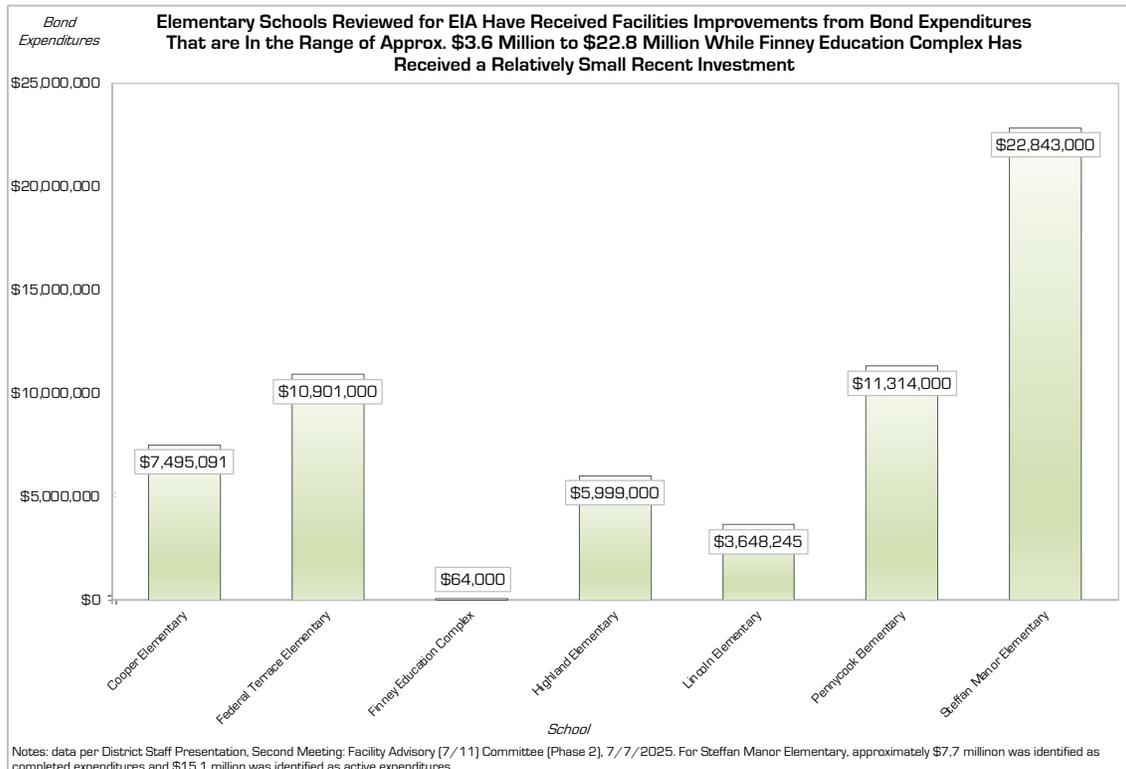
As can be seen for those schools that were rated, the schools reviewed by this EIA received comparable results to other District schools, ranging from ninety nine percent (99%) to one hundred percent (100%) and receiving ratings of "Good" or "Exemplary." Per the Solano County Office of Education, receiving a rating of "Good" or better "means the facility is maintained in a manner that assures that it is clean, safe, and functional."²

In reviewing the schools rated by the Solano County Office of Education, the facilities conditions of those schools selected for review under this EIA are not meaningfully different from the

² Solano County Office of Education, Superintendent of Schools Lisette Estrella-Henderson, "Williams Settlement Report," October 24, 2024.

facilities conditions of other District schools, and, therefore, it does not appear schools were selected for inclusion in this EIA based on this factor.

Further, it should be noted that all the elementary schools under review for this EIA have recently received multi-million-dollar facilities upgrade investments utilizing funds under the District’s Measure S bond program. Some bond funds have been utilized toward facilities upgrades at John Finney Education Complex; however, this investment has been relatively small in comparison to the investments made at the District’s elementary schools. A chart illustrating the dollar amount of facilities investments for each of the school sites under review is shown in the chart below.



The recent investment in improving school facilities indicates that these schools have not been historically underfunded in a manner resulting in dilapidated facilities conditions, and such investment of bond funds further reinforces the conclusion that the schools under review for this EIA were not selected due to the condition of their respective facilities.

(2) OPERATING COST OF SCHOOLS

The operating cost of schools is the second metric reviewed in this EIA. The metric is reviewed to assess the closure-related savings that may be achieved with each school under consideration for closure or consolidation, particularly as related to serving students with higher needs including students with disabilities. While not specified in law, the California Attorney General recommends that the analysis of operating costs of the schools under review include consideration of students who receive higher funding under the state's Local Control Funding Formula (LCFF), such as those students who qualify for free or reduced-price meals, students who are identified as English learners, homeless and foster youth, and students with disabilities.³

This EIA considers these higher-funded student groups prior to school closure or consolidation to gauge whether there would be a disproportionate impact on any particular group, as well as following implementation of school closure or consolidation, to understand whether the closure and/or consolidation of a particular school or schools would result in disproportionate impact(s) any particular student demographic group.⁴

To assess whether any school reviewed as part of this EIA has a disproportionate impact on any particular group, the following parameters were used:

- Whether the school has a higher percentage of students in any particular higher-funded student group as compared to other District schools not under review for this EIA, and
- Whether the school's percentage of students in any particular group is significantly higher (at least ten percent (10%) above) the Districtwide average across all schools.⁵

Following implementation of the school closure or consolidation options, a determination is made as to whether the concentration of students being assessed reaches a significantly high level. The parameters for defining a significantly high level are, for purposes of this analysis, established at the same thresholds: whether the school has a higher percentage as compared to other District schools not under review for this EIA, and whether the school's percentage is significantly higher (at least ten percent (10%) above) than the Districtwide average across all schools.

This metric also provides cost savings estimates that were developed by District staff for each school. District staff are also considering how savings will be achieved after any closing or consolidation of school sites. However, projecting costs after closure or consolidation rely on assumptions which could be impacted by a number of unknowable factors, including changes to District transportation policies, changes to District boundaries, intradistrict transfers, and changes to applicable law and funding criteria.

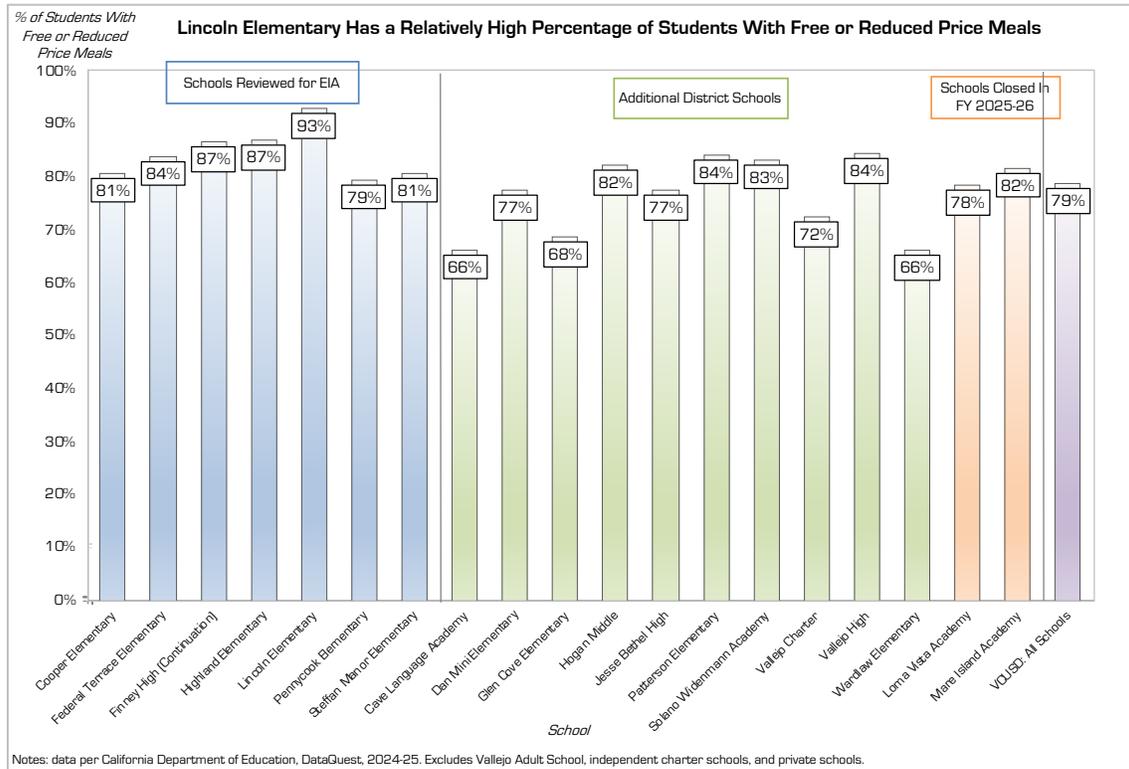
³ State of California, Office of the Attorney General Rob Bonta, "Guidance Regarding Laws Governing School Closures and Best Practices for Implementation in California," April 11, 2023.

⁴ Student data is per the California Department of Education (CDE). The John Finney Education Complex houses multiple special programs including John Finney High. Student data is reported by CDE for John Finney High. For purposes of analyzing student data, John Finney High is shown throughout this EIA. Lincoln Elementary School currently serves grades TK-3 beginning fiscal year 2025-26. Previously the school served grades TK-2 and student data is reported by CDE for the TK-2 grade levels. For purposes of analyzing student data, Lincoln Elementary is shown at the previous grade levels served throughout this EIA.

⁵ For purposes of this analysis, 10% was established as an assumption for a threshold of significance. The significance of 10% is demonstrated by falling within the range of one to two standard deviations of the mean for the datasets of most major metrics reviewed.

Students Who Qualify for Free or Reduced-Price Meals

The chart below illustrates the percentage of students at each school within the District who qualify for free or reduced-price meals.

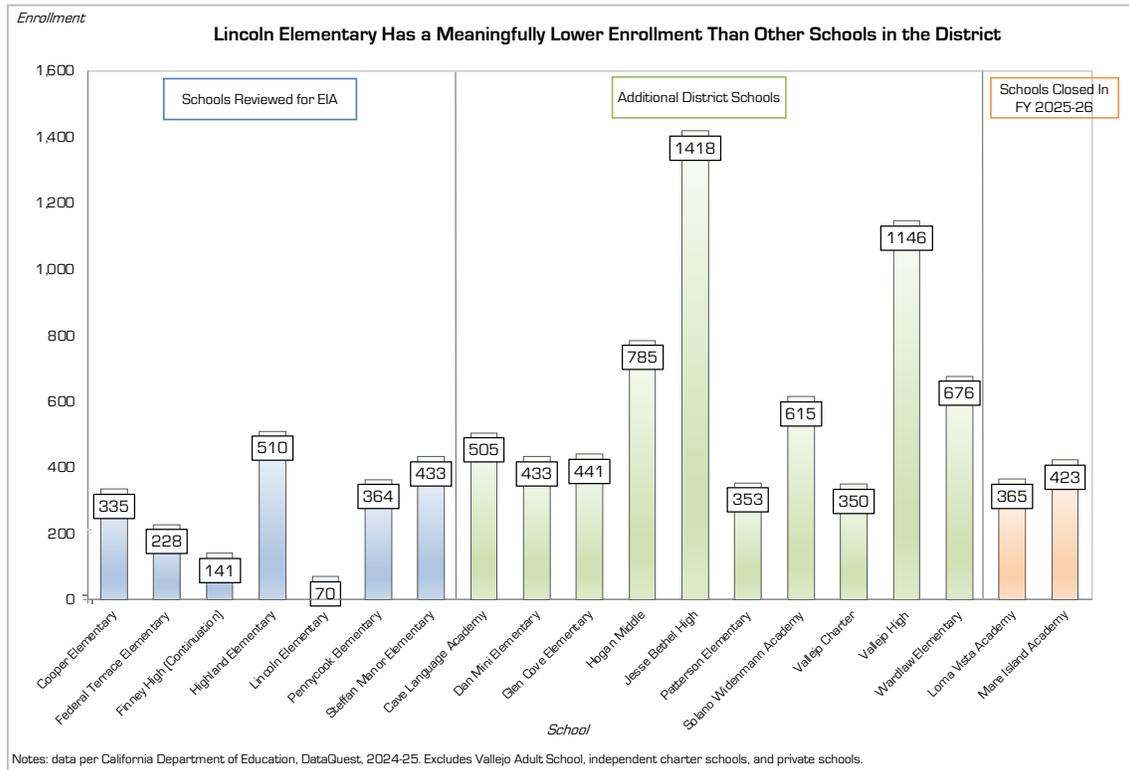


As shown, Lincoln Elementary has the highest percentage of students within the District who qualify, exceeding other District schools not under review for this EIA and significantly higher (more than ten percent (10%) above) the Districtwide average on a percentage basis. This result suggests that Lincoln Elementary serves a higher-need group of students than typically found in District schools, contributing to both higher operating cost and higher LCFF funding. Should this school be closed or consolidated, these students will be served by the receiving school and both the operating cost and funding associated with these students would transfer to the receiving school.

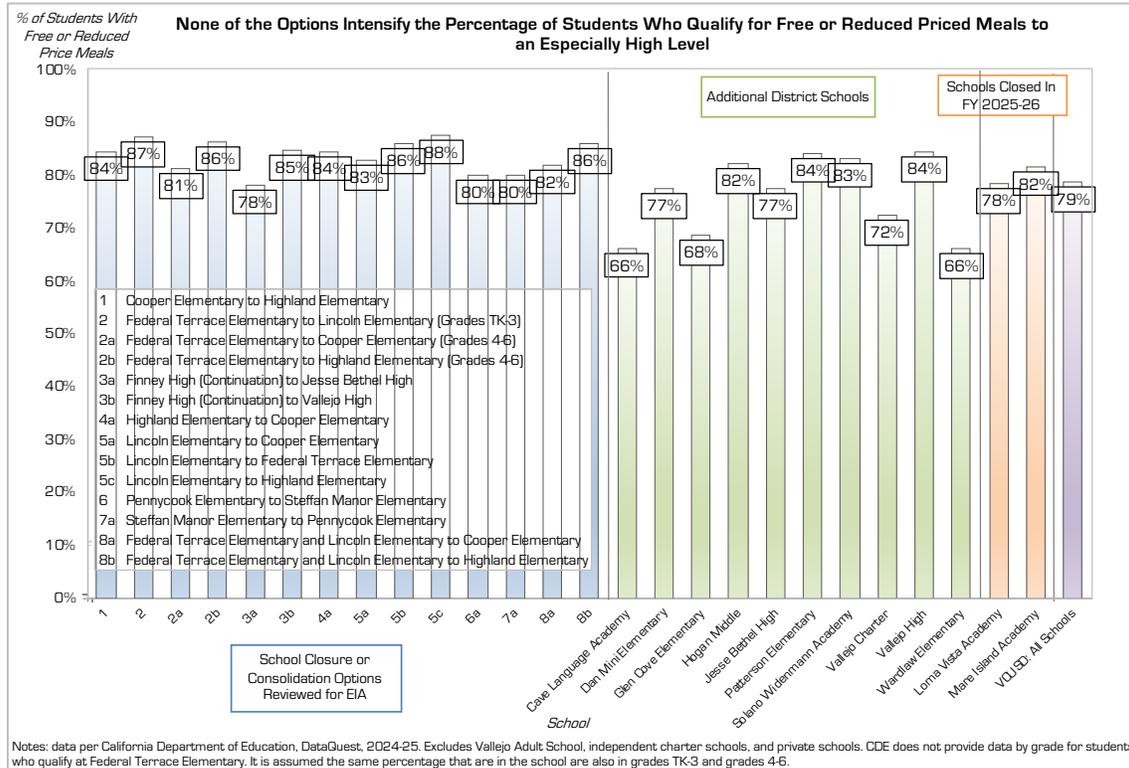
Several schools not selected for evaluation in this EIA have a relatively high percentage of students who qualify for free or reduced-price lunches, and so therefore it does not appear schools were selected for inclusion in this EIA based on this factor.

In comparisons involving Lincoln Elementary, it is important to note Lincoln Elementary serves a relatively small number of students, a relatively few number of grades, and differences from Districtwide averages are also explainable by natural variance expected from a smaller sample size of students. Given the differences in school sizes, a school with a higher percentage of students who are in an examined group does not necessarily mean that the school serves a higher number of total students that are within such group. The differences in school sizes can be seen with a comparison of student enrollments.

The chart below illustrates the student enrollment at each school within the District:



Following implementation of the school closure or consolidation options, none of the options result in an intensification of the percentage of students who qualify for free or reduced-price meals attending each school to a level that is significantly high in comparison to the other District schools. The resulting outcome of the percentage of students who qualify at each school is illustrated in the chart below.

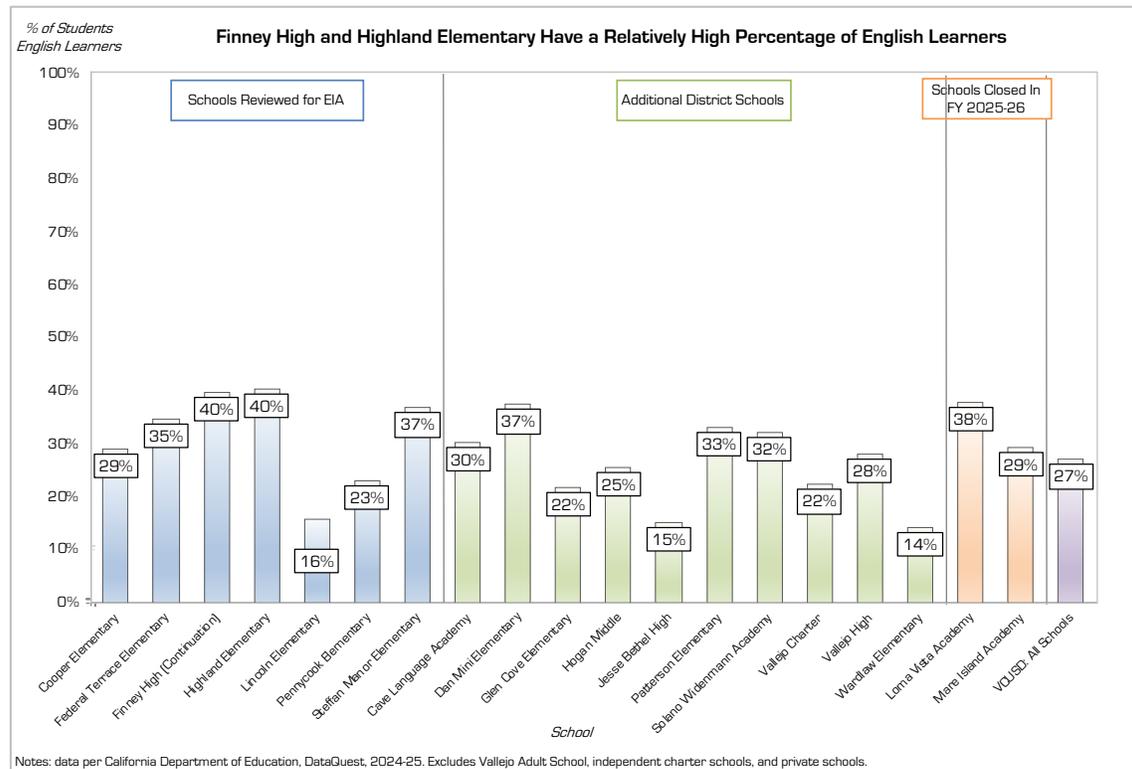


For those options involving students to be received at multiple schools where an attendance boundary is to be split along a major road or freeway, detailed student data is not available for the split groups of students. However, given the split groups of students will be smaller than the transfer of the entire school of students, the outcomes are not anticipated to be materially different than the results shown above.

A noteworthy conclusion is that all consolidation options involving the closure of Lincoln Elementary result in greater distribution of students who qualify for free or reduced lunches across the District schools.

English Learners

The chart below illustrates the percentage of students at each school within the District who are English learners.



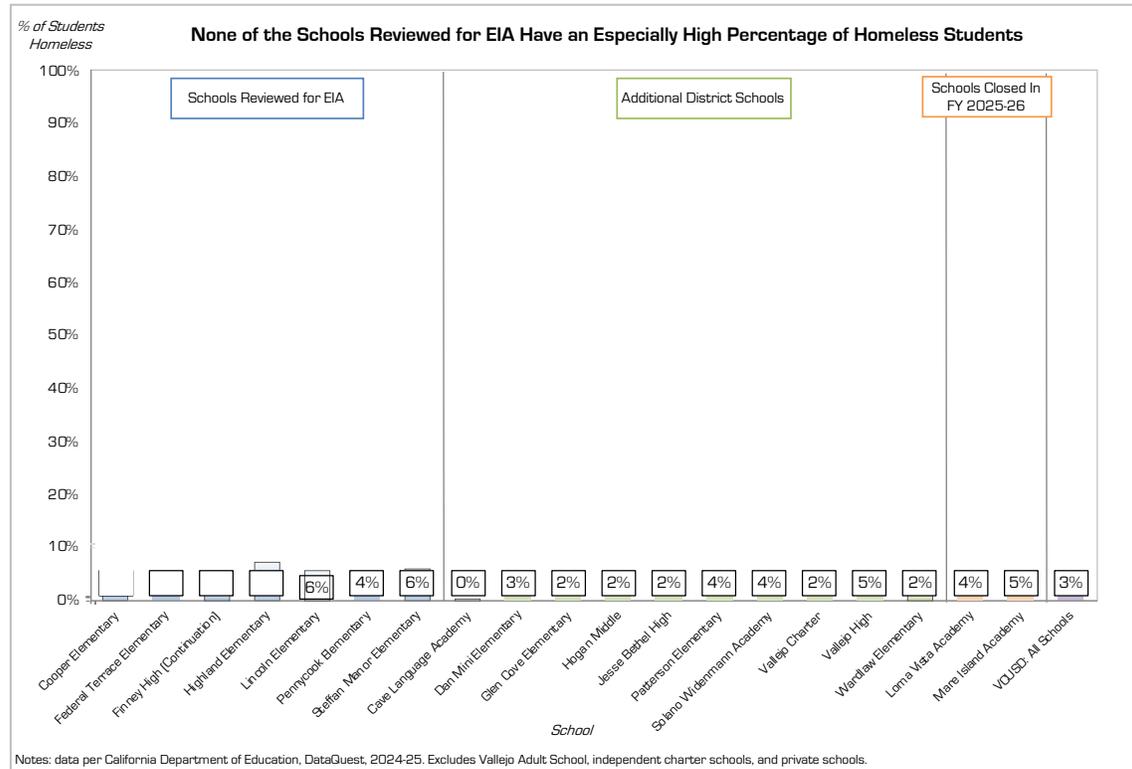
As shown, John Finney High and Highland Elementary have the highest percentage of students who are English learners within the District, exceeding other District schools not under review for this EIA and significantly higher (more than ten percent (10%) above) the Districtwide average on a percentage basis. This result suggests that these schools serve a higher-need group of students than typically found in District schools, contributing to both higher operating cost and higher LCFF funding. Should these schools be closed or consolidated, these students will be served by the receiving school and both the operating cost and funding associated with these students would transfer to the receiving school.

Several schools not selected for evaluation in this EIA have a relatively high percentage of students who are English learners, such as Dan Mini Elementary and Patterson Elementary. Therefore, it does not appear schools were selected for inclusion in this EIA based on this factor.

Following implementation of the school closure or consolidation options, none of the options result in an intensification of the percentage of English learner students attending each school to a level that is significantly high in comparison to the other District schools. This analysis is discussed in more detail in the Demographics section of this report.

Homeless Students

The chart below illustrates the percentage of students at each school within the District who are homeless.

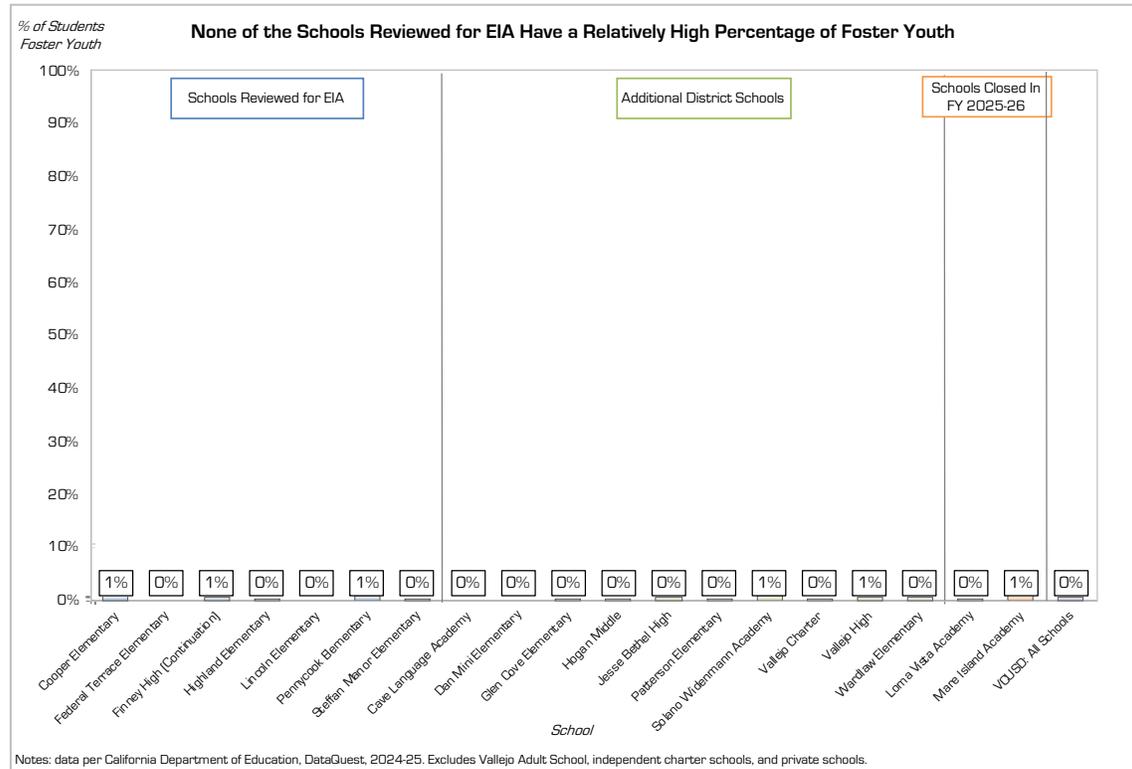


As shown, none of the schools reviewed for purposes of this EIA have an especially high percentage of homeless students compared to the other schools within the District. It does not appear schools were selected for inclusion in this EIA based on this factor.

Following implementation of the school closure or consolidation options, none of the options result in an intensification of the percentage of homeless students attending each school to a level that is significantly high in comparison to the other District schools. This analysis is discussed in more detail in the Demographics section of this report.

Foster Youth

The chart below illustrates the percentage of students at each school within the District who are foster youth.

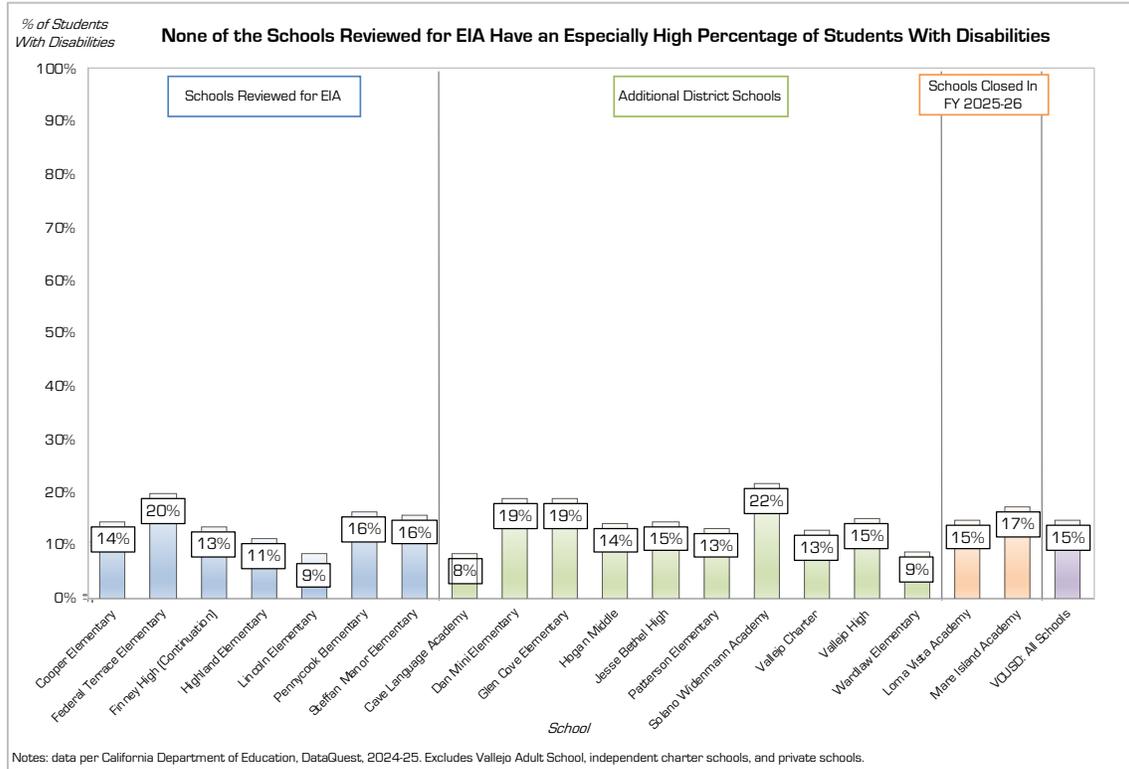


As shown, none of the schools reviewed for EIA have an especially high percentage of students who are foster youth compared to the other schools within the District. Further, these percentages are at such low levels that they are unlikely to have any material impact on operating cost or LCFF funding. It does not appear schools were selected for inclusion in this EIA based on this factor.

Following implementation of the school closure or consolidation options, none of the options result in an intensification of the percentage of foster youth students attending each school to a level that is significantly high in comparison to the other District schools. This analysis is discussed in more detail in the Demographics section of this report.

Students With Disabilities

The chart below illustrates the percentage of students at each school within the District with disabilities.



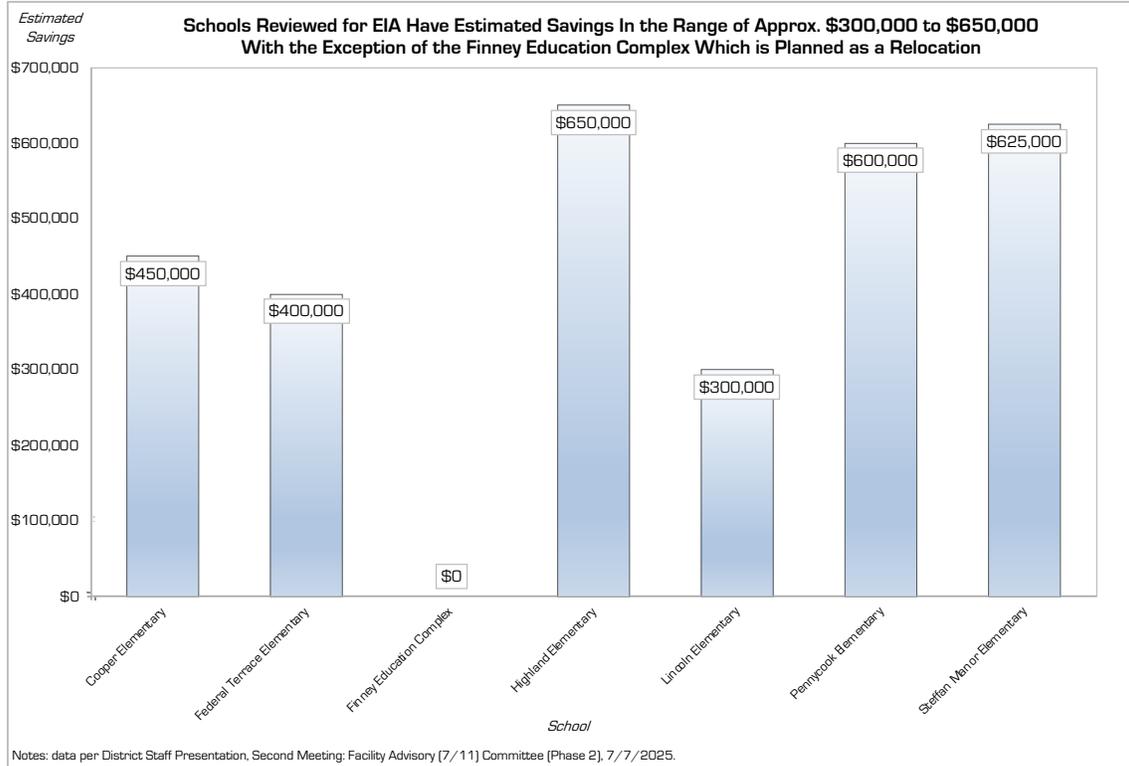
As shown, none of the schools reviewed for EIA have an especially high percentage of students with disabilities compared to the other schools within the District, and it does not appear schools were selected for inclusion in this EIA based on this factor.

Following implementation of the school closure or consolidation options, none of the options result in an intensification of the percentage of students with disabilities attending each school to a level that is significantly high in comparison to the other District schools. This analysis is discussed in more detail in the Demographics section of this report.

Having considered groups of students that receive higher funding under LCFF, it can be concluded that none of the receiving schools will be disproportionately impacted whereby they would serve an especially high concentration of these students in comparison to other District schools.

Estimated Savings

The chart below illustrates the estimates of closure-related savings that may be achieved with each school under consideration for closure or consolidation.



The estimated savings above does not include any potential future increases in the cost of transportation services, as there are several options to address transportation needs, and some options do not result in substantive cost increases. Options available to address transportation services include:

- Staggering school bell schedules
- Changing Board policy on minimum distance guidelines
- Adding more busses and bus drivers to the fleet

The options for addressing transportation services are dependent on which schools are selected for closure or consolidation, the resulting impact on transportation needs, and the anticipated costs of implementing the chosen options.

The table below shows the estimated savings in the context of the estimated operating costs of the schools:

<i>Potential School Under Review</i>	<i>Estimated Operating Cost</i>	<i>Estimated Per Student Cost</i>	<i>Estimated Savings</i>	<i>Estimated Savings as % of Cost</i>
1 Cooper Elementary	\$1,996,665	\$5,960	\$450,000	23%
2 Federal Terrace Elementary	\$1,665,473	\$7,305	\$400,000	24%
3 Finney Education Complex	\$1,907,104	\$13,526	\$0	0%
4 Highland Elementary	\$3,537,655	\$6,937	\$650,000	18%
5 Lincoln Elementary	\$1,092,104	\$15,601	\$300,000	27%
6 Pennycook Elementary	\$2,726,341	\$7,490	\$600,000	22%
7 Steffan Manor Elementary	\$2,998,189	\$6,924	\$625,000	21%

Some noteworthy findings:

- Lincoln Elementary, which has the highest percentage of students within the District who qualify for free or reduced-price meals, also has the highest estimated operating cost per student and the highest estimated savings as a percentage of cost. However, it is the smallest elementary school campus under review with the smallest amount of enrollment and capacity. Therefore, the total estimated savings is relatively low. These numbers suggest that although the estimated savings is a lower overall figure, operating smaller schools is less cost-efficient for the District because of certain minimum overhead costs required regardless of school size.
- Highland Elementary, which along with John Finney High has the highest percentage of students who are English learners within the District, has the highest amount of total estimated savings. However also importantly, it is the largest elementary school campus under review with the highest amount of enrollment and capacity. Further, the school has a relatively low estimated operating cost per student and the lowest estimated savings as a percentage of cost. These numbers suggest that although the estimated savings is a higher overall figure, operating larger schools is more cost-efficient for the District because overhead costs can be used to serve a larger number of students.
- John Finney Education Complex, where John Finney High along with Highland Elementary has the highest percentage of students who are English learners within the District, has no estimated savings at this time. This is because John Finney students are not expected to be integrated into a receiving school for operating cost efficiency. Rather, the school is expected to be relocated and operated as either its own school or in a “school within a school” framework. Because there is no integration of students, there is not expected to be any reduction in administration of instructional staff, which is where the vast majority of savings from closing or consolidating schools is expected to be achieved.

In consideration of the foregoing, the findings indicate schools have not been identified for review under this EIA on the basis that they serve students with higher needs and therefore receive higher funding. For the District, a factor that appears to have a large impact on operating costs appears to be school size, with smaller schools being less cost-efficient to operate than larger schools.

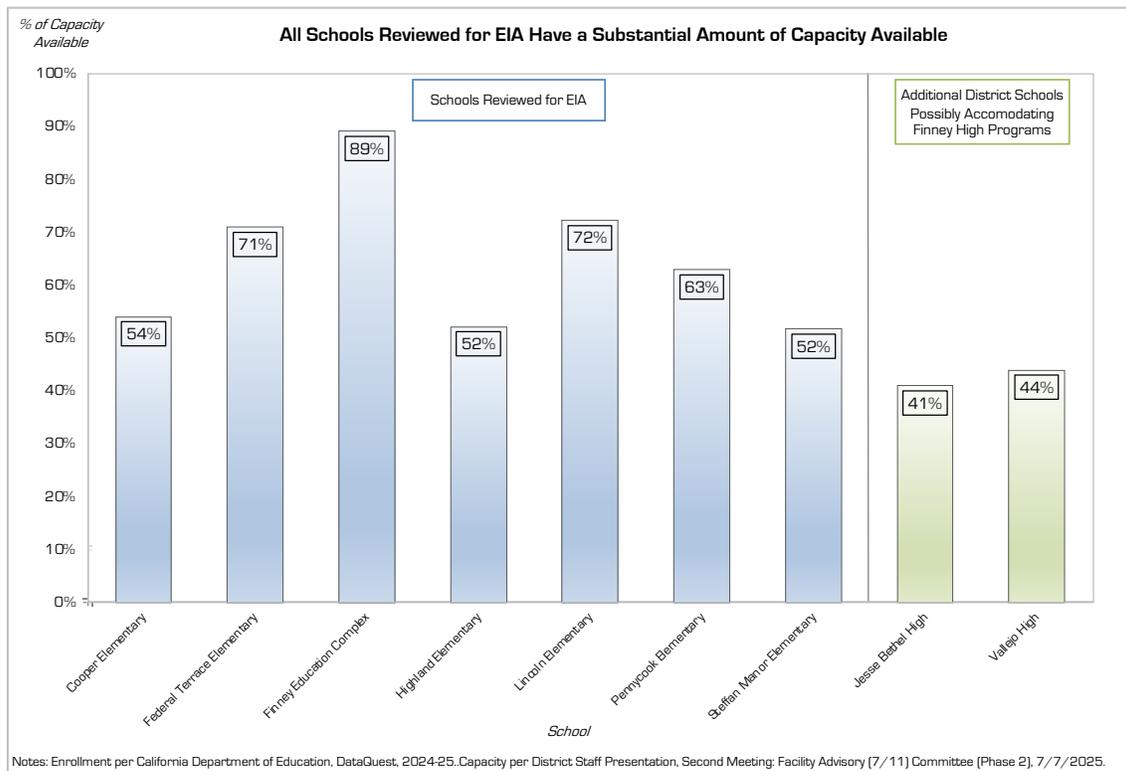
Further, although Lincoln Elementary has a high percentage of students which qualify for free or reduced-price lunches, when considering the absolute number of students in such demographic group in comparison to Lincoln’s small school size, the closure of Lincoln Elementary will not have a disproportionate impact on that group as a whole. Therefore, none of the options under consideration would have a discriminatory and disproportionate impact on a particular student group reviewed in this EIA.

Finally, no closure or consideration evaluated in this EIA would lead to a discriminatory, disproportionate effect on the concentration of a particular student group at a receiving school.

(3) CAPACITY OF SCHOOLS

The third metric evaluated in this EIA is the capacity of schools. This metric is reviewed to assess whether the receiving schools can accommodate potential incoming students from any schools that may be closed or consolidated.

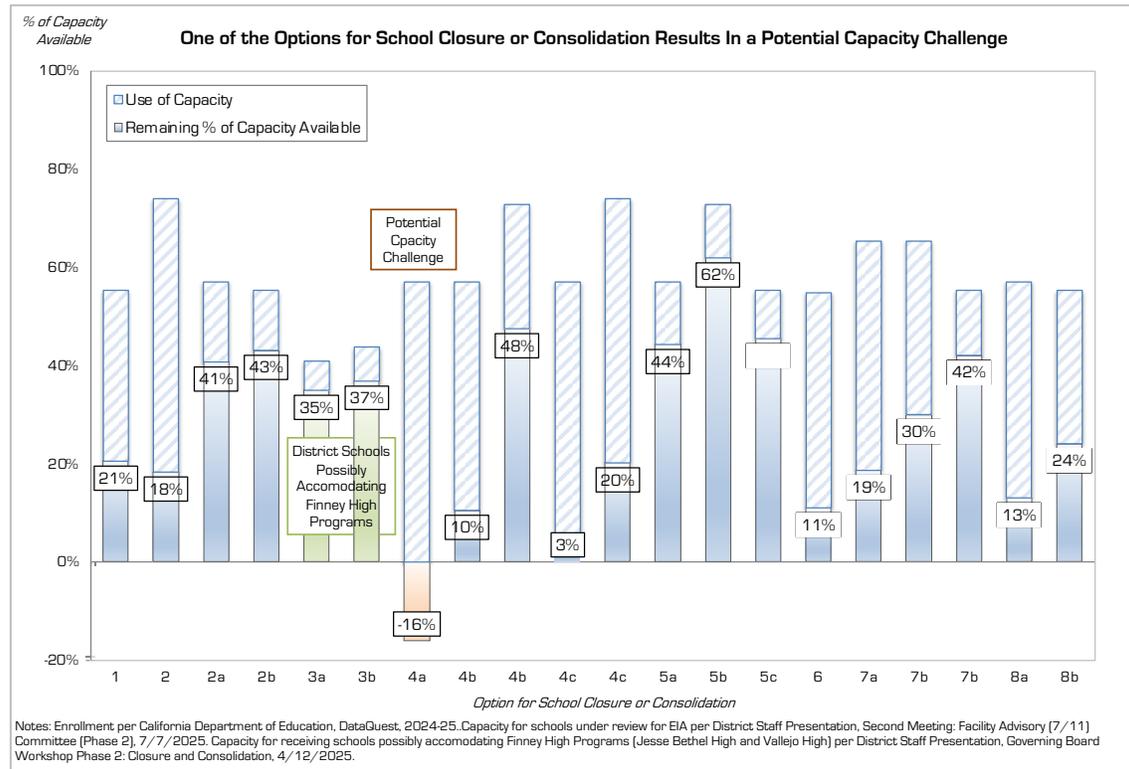
The current capacity of schools to accommodate students is shown in the chart below:



As reflected in the chart above, all schools under review have a substantial amount of capacity available, ranging from fifty two percent (52%) to eighty nine percent (89%). However, as noted in other sections of this EIA and below, capacity percentage is relative to a school’s absolute size and can also be impacted by other external factors such as capacity of surrounding streets.

By way of example, Cooper Elementary and Highland Elementary have what appear to be similar levels of available capacity at fifty four percent (54%) and fifty two percent (52%), respectively. However, the total capacity of Cooper Elementary is just over 700 in comparison to Highland Elementary which has a total capacity of just over 1,000. As a result, the available capacity in terms of the number of additional students that can be housed in the school is much smaller at Cooper Elementary than at Highland Elementary.

Based on a consideration of the proposed options for school closure or consolidation, the amount of available capacity is expected to result in the figures shown in the chart below:



School Closure or Consolidation Options Reviewed for EIA	Receiving School
1 Cooper Elementary to Highland Elementary	Highland Elementary
2 Federal Terrace Elementary to Lincoln Elementary (Grades TK-3)	Lincoln Elementary
2a Federal Terrace Elementary to Cooper Elementary (Grades 4-6)	Cooper Elementary
2b Federal Terrace Elementary to Highland Elementary (Grades 4-6)	Highland Elementary
3a Finney Education Complex to Jesse Bethel High	Jesse Bethel High
3b Finney Education Complex to Vallejo High	Vallejo High
4a Highland Elementary to Cooper Elementary	Cooper Elementary
4b Highland Elementary to Cooper Elementary (split), and to Federal Terrace Elementary (split)	Cooper Elementary Federal Terrace Elementary
4c Highland Elementary to Cooper Elementary (split), and to Lincoln Elementary (split)	Cooper Elementary Lincoln Elementary
5a Lincoln Elementary to Cooper Elementary	Cooper Elementary
5b Lincoln Elementary to Federal Terrace Elementary	Federal Terrace Elementary
5c Lincoln Elementary to Highland Elementary	Highland Elementary
6 Pennycook Elementary to Steffan Manor Elementary	Steffan Manor Elementary
7a Steffan Manor Elementary to Pennycook Elementary	Pennycook Elementary
7b Steffan Manor Elementary to Pennycook Elementary (split), and to Highland Elementary (split)	Pennycook Elementary Highland Elementary
8a Federal Terrace Elementary and Lincoln Elementary to Cooper Elementary	Cooper Elementary
8b Federal Terrace Elementary and Lincoln Elementary to Highland Elementary	Highland Elementary

As reflected in the chart above, most receiving schools would be able to accommodate a closure or consolidation. However, Cooper Elementary would be challenged to receive all of the students from Highland Elementary. The capacity shortfall amounts to one hundred seventeen (117) students. As a result, alternative arrangements would need to be made to accommodate the

Highland Elementary students, which by way of example, could include a school attendance boundary adjustment so that some students are assigned to attend Federal Terrace Elementary. Additional options include creating capacity through class size adjustments or scheduling adjustments, or the addition of capacity with modulars or portables. However, while not insurmountable, all the options to address capacity are highly impactful and could be difficult, complex, and/or expensive to implement and so may require additional planning and consideration. Even in this scenario, Cooper Elementary would be near its maximum capacity and be expected to experience significant traffic impacts as further discussed in the transportation metric. Further, this capacity calculation does not account for increased capacity needs for special education programs which Cooper Elementary would likely struggle to accommodate. This metric indicates that the closure of Highland and relocation of students to Cooper is comparatively the most challenging closure and consolidation evaluated in this EIA.

All other options under consideration have more than sufficient capacity to accommodate the incoming students from schools either closed or consolidated.

(4) SPECIAL PROGRAMS AT SCHOOLS

The fourth metric evaluates special programs at schools and whether the closure of the school would remove student access to a unique or significant program. This metric also accounts for whether such programs may be accommodated at receiving schools. The review is to include consideration of special day classes.

Three special programs are housed at the John Finney Education Complex:

1. Everest Academy, which serves students with individualized education plans (IEPs). The special education program supports students from middle school through post-high school as they transition into the workforce.
2. Independent Study Academy, designed for students who need an alternative to the traditional high school setting.
3. John Finney High School, a continuation high school focusing on credit recovery and alternative education.

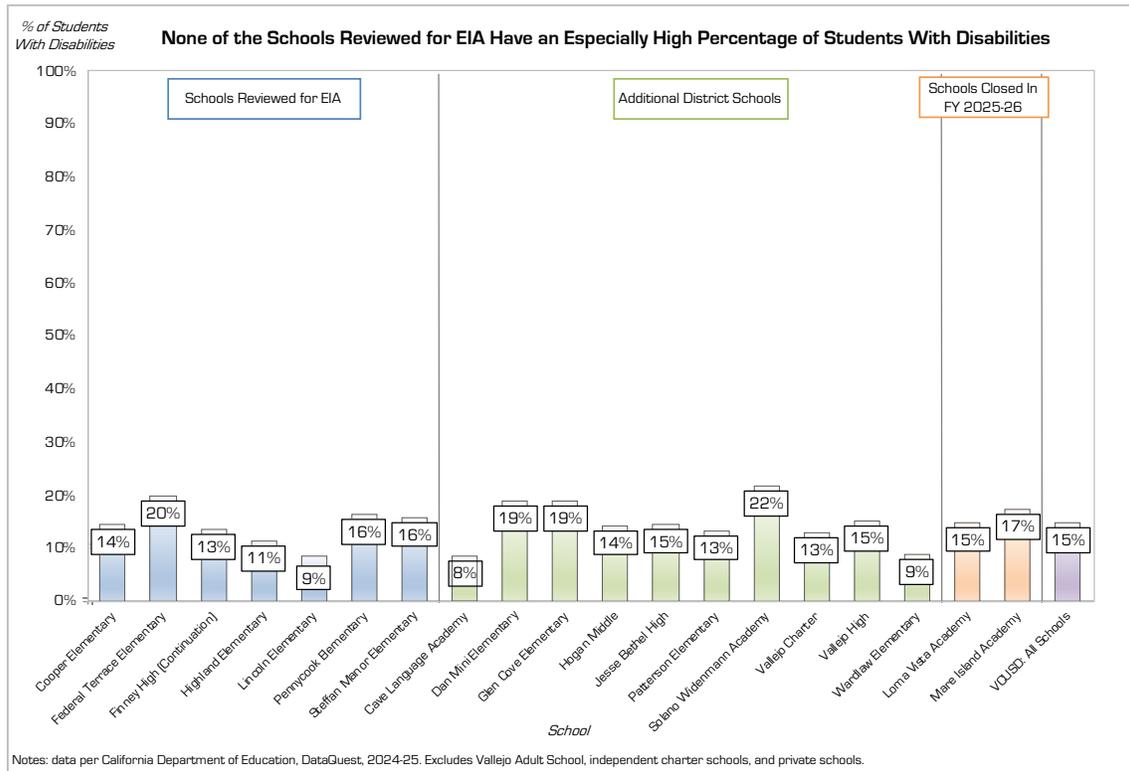
Importantly, none of these programs are under consideration for closure. Rather, the programs are being considered for consolidation, meaning that the programs are expected to be relocated to another school campus. Given that each of these special programs serve specific student populations, it is essential from an equity standpoint for these special programs to be maintained following consolidation, and importantly the closure and consolidation options in this EIA all would maintain these special programs.

The special programs currently housed at the John Finney Education Complex serve students in the high school grade levels. Jesse Bethel High School and Vallejo High School each have the capacity to accommodate all of these special programs. John Finney High School students are not expected to be integrated into classrooms and programs with other students attending Jesse Bethel High School or Vallejo High School. Rather, the school is expected to be relocated and operated as either its own school or as a “school within a school” framework.

Additionally, some of the closed school sites may be considered for occupancy by John Finney High School following the relocation of the program.

The elementary schools under review for this EIA were also all considered for special programs. More specifically, the analysis included any programs that might be unique to the school site or rare – as opposed to a Districtwide program offering at multiple school sites, such as a dual-language immersion academy, a specific after-school program, or a program that requires a customized school facility not typically available elsewhere. After consideration, childhood development programs (such as preschool or before-and-after school care) were identified as programs not universally offered but which are currently offered at a half-dozen of the elementary schools and could be readily relocated. Additionally, Loma Vista has recently been developed into a dedicated Early Education Center. In conclusion, no special programs were identified at the elementary schools that merit consideration during school closure or consolidation.

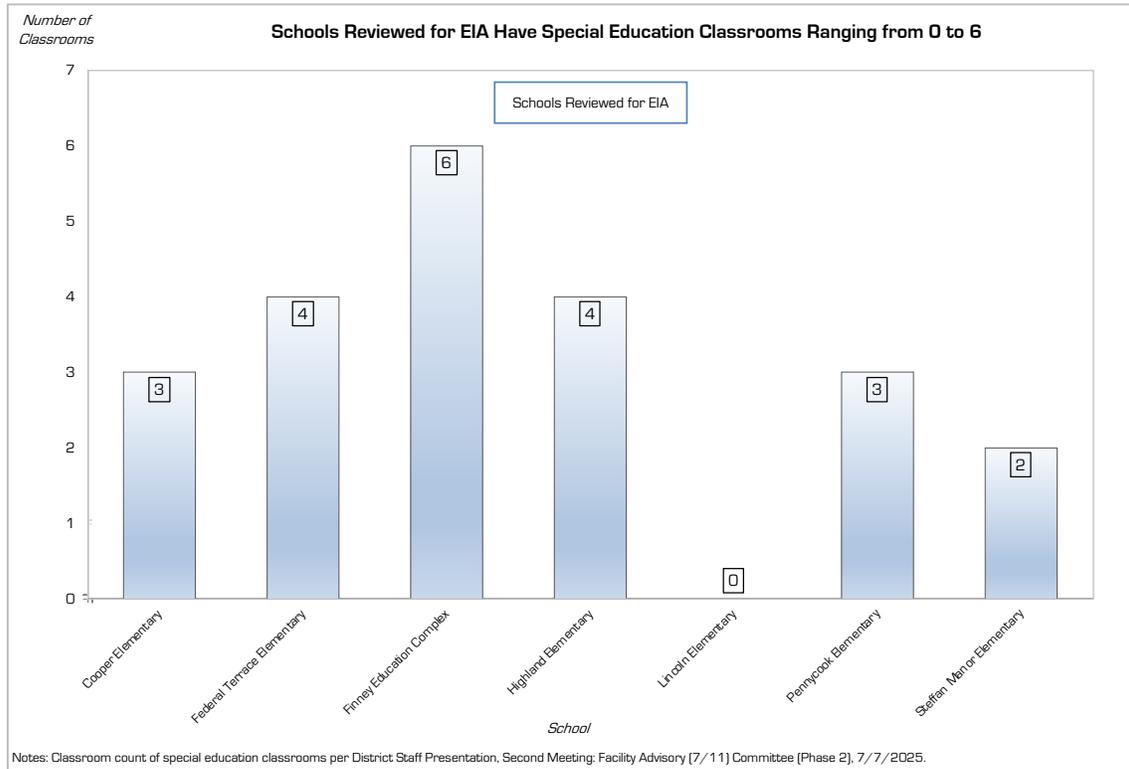
This EIA is also to consider special day classes involving students with disabilities. The percentage of students with disabilities is shown in the chart below:



None of the schools considered for closure or consolidation have a significantly high percentage of students with disabilities in comparison to the other District schools. Further, all potential receiving schools have special education programs and serve students with disabilities.

It can be concluded that none of the options under consideration would have a discriminatory and disproportionate impact on these students. Further, no closure or consideration evaluated in this EIA is expected to lead to a discriminatory, disproportionate effect on the concentration of students with disabilities at a receiving school.

Typically, special day classes (SDCs) serving students with disabilities offer smaller class sizes for more intensive educational services. The number of special education classrooms at each school under review for EIA is shown in the chart below:



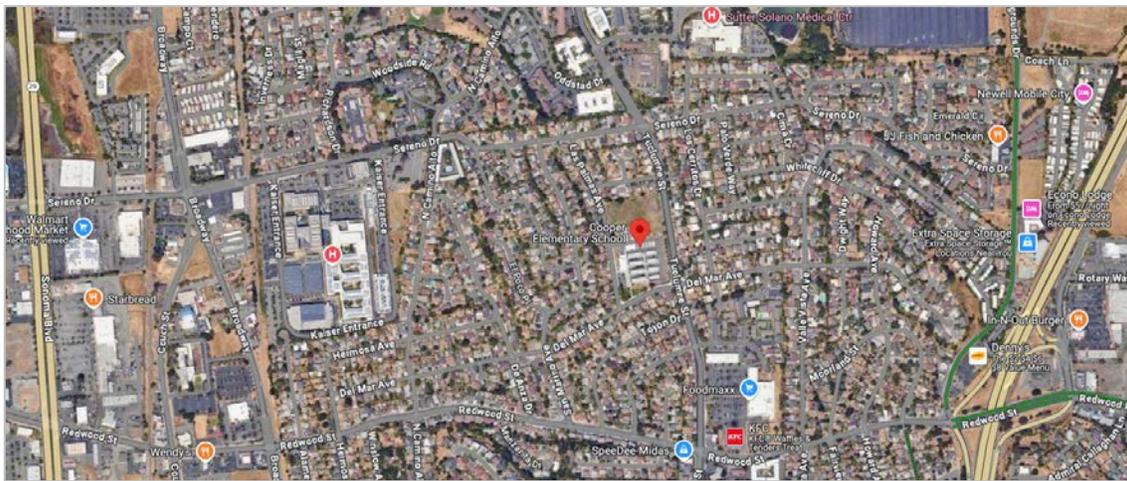
Given the amount of available capacity at the receiving schools even after implementation of the school closures or consolidations under consideration, it is anticipated that all but one option for school closure or consolidation could accommodate the students with disabilities. The one exception is that Cooper Elementary may be challenged with receiving students from Highland Elementary, as Cooper Elementary does not currently have the capacity to accommodate both the students at Cooper Elementary plus the incoming students from Highland Elementary. As a result, alternative arrangements for capacity would need to be made to accommodate the Highland Elementary students. This is discussed in more detail in the Capacity section of this report.

(5) ENVIRONMENTAL FACTORS

The fifth metric evaluated in this EIA is environmental factors. Environmental factors are reviewed to assess the schools' traffic conditions and proximity to freeways, railroad tracks, and any polluting industries to consider whether increasing attendance at a receiving school would intensify any environmental concerns which are likely to negatively impact student health or safety. Each of these factors is discussed for the school sites under review below. However, as will be shown, even if environmental concerns may exist, none of the concerns are expected to have a perceivable impact on student health or safety and, none of the impacts are expected to disproportionately impact a group evaluated in this EIA.

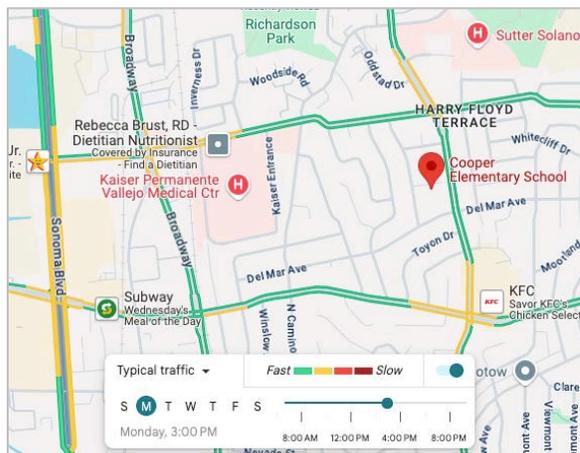
Cooper Elementary

Surrounding Environment: Cooper Elementary is surrounded by single-family residential housing. A map of the school's location is shown below:



Proximity to Freeways: The school is approximately ½ mile east of the Interstate 80 freeway and approximately 1 mile west of the State 29 freeway (State 29).

Traffic Conditions: Cooper Elementary has Kaiser Health, Sutter Health, and commercial businesses all located nearby. As a result, the major intersections near the school along with State 29 can suffer from heightened traffic levels around the time that the school's bell schedule ends. Below is a map showing typical traffic congestion at 3:00 p.m. on a Monday.



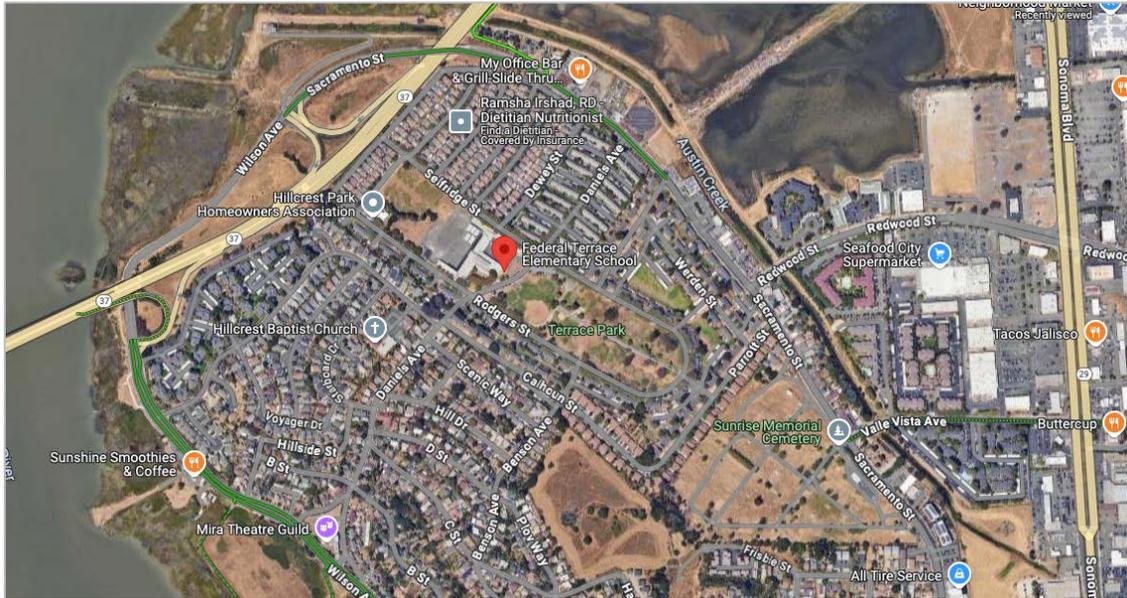
Proximity to Railroad Tracks: None in immediate vicinity.

Any Polluting Industries: None identified.

Conclusion: Although there is moderate traffic at nearby intersections, it can be reasonably concluded that the environmental conditions at Cooper Elementary have a less than significant impact on students, and would continue to be less than significant if Cooper Elementary was selected as a receiving school

Federal Terrace Elementary

Surrounding Environment: Federal Terrace Elementary is surrounded by single-family residential housing. A map of the school's location is shown below:



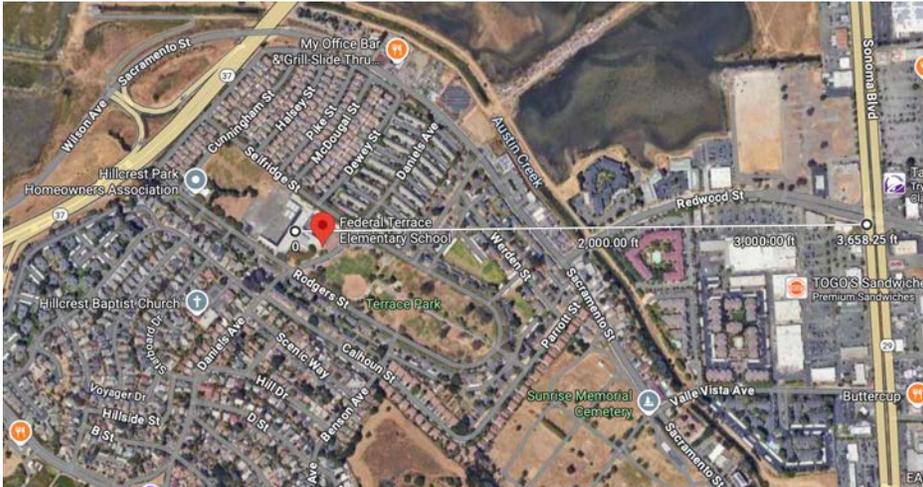
Proximity to Freeways: The school is located within one thousand (1,000) feet southwest of the State 37 freeway (State 37), and approximately 1 mile east of State 29.

Federal Terrace is outside the five hundred (500)-foot distance that triggers environmental analysis for school sites under the California Environmental Quality Act (CEQA) and outside the five hundred (500)-foot distance that is recommended by the California Air Resources Board. As a result, it is possible the proximity of the school to State 37 may cause elevated noise and air pollution levels, but the levels still fall below parameters for evaluation under applicable law.

A more detailed map illustrating the distance between the school and State 37 is shown below:



A more detailed map illustrating the distance between the school and State 29 is shown below:



Traffic conditions: No significant traffic identified at the school site. However, if Federal Terrace Elementary was chosen for closure or consolidation, all receiving schools under consideration (Lincoln Elementary, Cooper Elementary, and Highland Elementary) are on the other side of the State 29 freeway. This means that students from the community could not easily walk (if at all) to the receiving schools. Therefore, closure of Federal Terrace Elementary could have a negative environmental impact on students and a negative impact on traffic conditions at major intersections between Federal Terrace and any receiving schools.

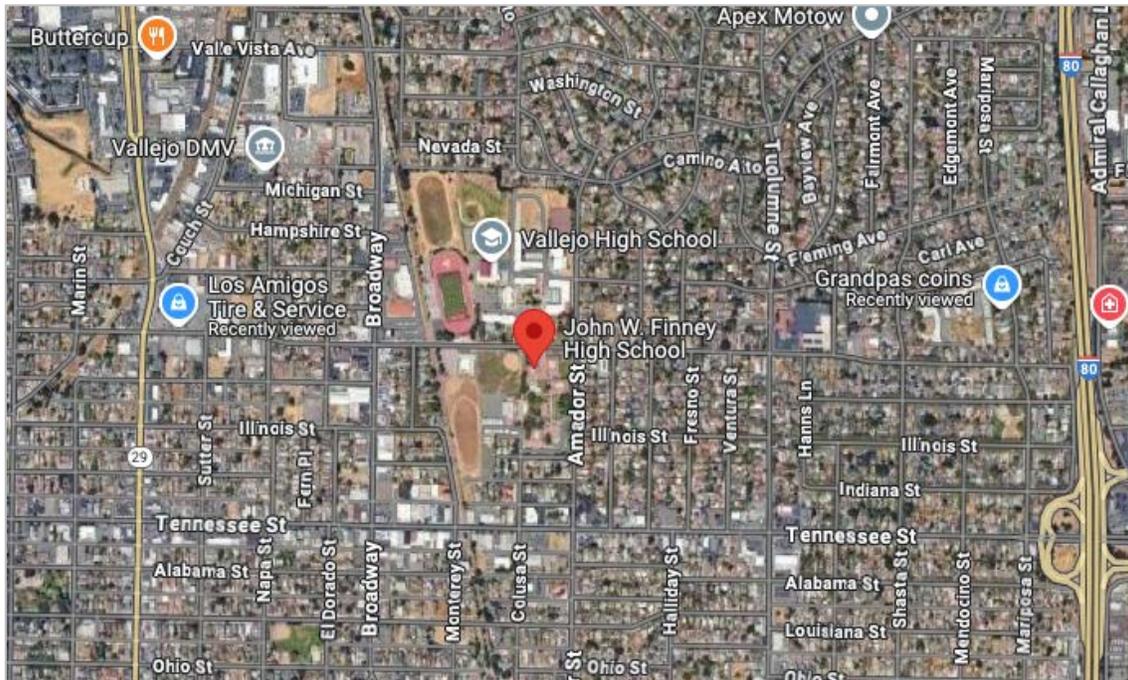
Proximity to Railroad Tracks: None in immediate vicinity.

Any Polluting Industries: None identified.

Conclusion: It can be reasonably concluded that the environmental conditions at Federal Terrace Elementary have a less than significant impact on students and would continue to be less than significant if Federal Terrace Elementary was selected as a receiving school. However, if Federal Terrace Elementary were chosen for closure or consolidation, there may be impacts on students due to the school's geographic location, and further evaluation would be needed to determine the impact of any such closure on traffic conditions and student path of travel.

John Finney Education Complex

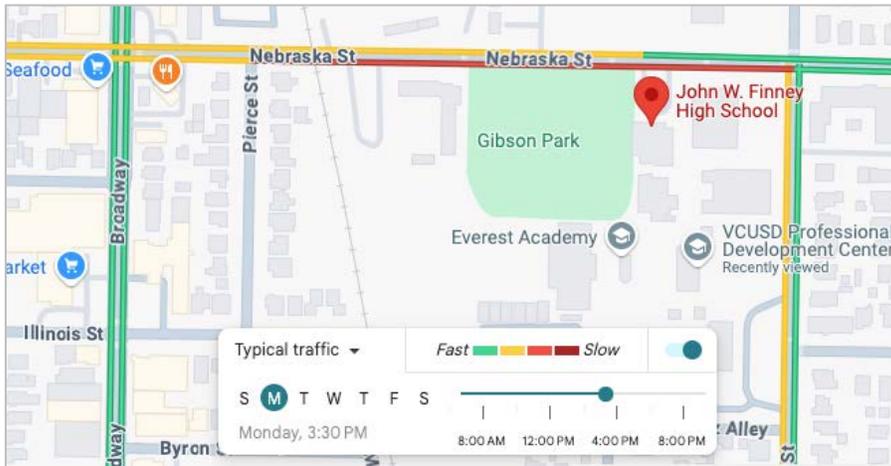
Surrounding Environment: John Finney Education Complex is located across Nebraska Street from Vallejo High School and is otherwise surrounded primarily by single-family residential housing. A map of the school's location is shown below:



Proximity to Freeways: The school is approximately 1 mile east of the Interstate 80 freeway (Interstate 80) and a similar distance west of State 29.

Traffic Conditions: Streets adjacent to the John Finney Education Complex, specifically Nebraska Street and Amador Street, can suffer from heightened traffic levels around the time that the school's bell schedule ends.

Below is a map showing typical traffic congestion at 3:30 p.m. on a Monday:

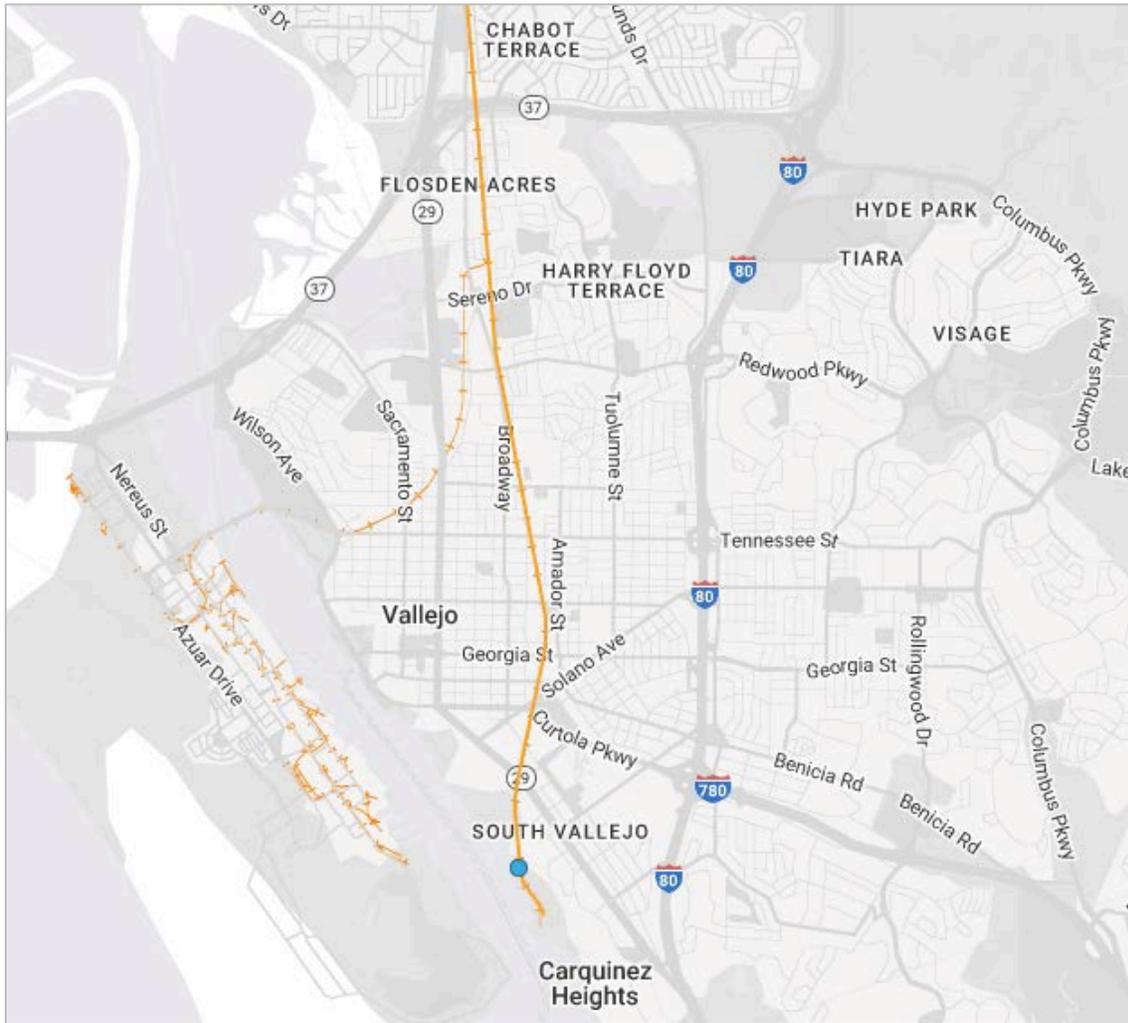


Relocation of John Finney High could lessen traffic for students at the adjacent Vallejo High if John Finney High programs would be fully or partially shifted to other sites that do not share an access road with Vallejo High.

Proximity to Railroad Tracks: John Finney Education Complex is located over seven hundred (700) feet west of railroad tracks. A more detailed map illustrating the distance between the school and railroad tracks is shown below:



The railroad tracks are used for freight service and operated by the California Northern Railroad (CFNR). The tracks make their way through Vallejo, as shown in the map below. Relocation of John Finney High would likely lessen the number of student interactions with the railroad tracks as programs would be fully or partially shifted to other sites that are further from railroad tracks.



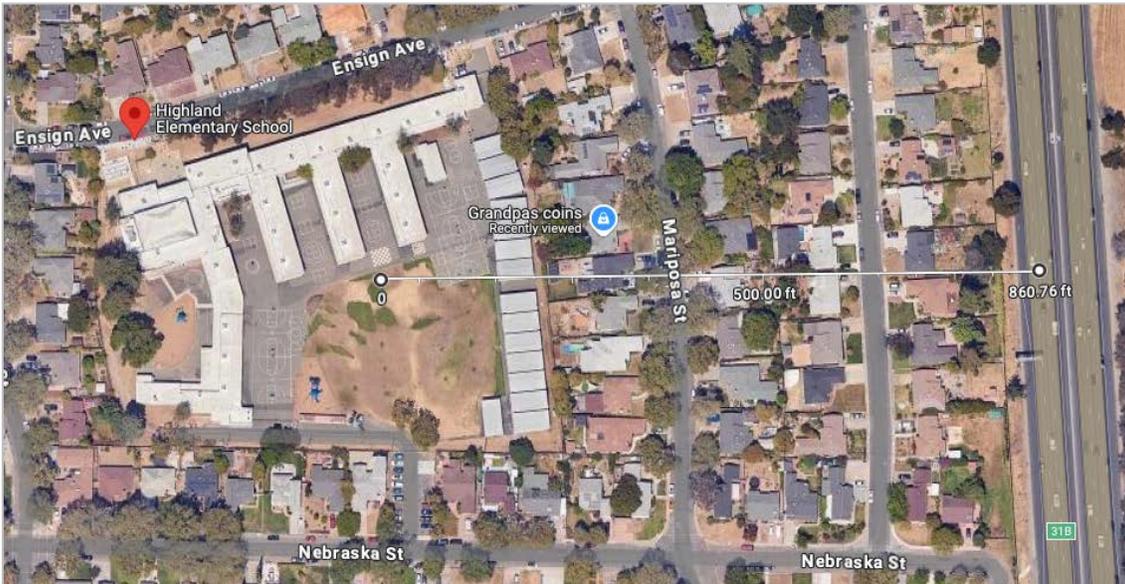
Any polluting industries: None identified.

Highland Elementary

Surrounding Environment: Highland Vista Elementary is surrounded primarily by single-family residential housing. A map of the school's location is shown below:



Proximity to Freeways: The school is located within 1,000 feet of Interstate 80. However, it is outside the five hundred (500)-foot distance that triggers environmental analysis for school sites under the California Environmental Quality Act (CEQA) and outside the five hundred (500)-foot distance that is recommended by the California Air Resources Board. A more detailed map illustrating the distance between the school and freeway is shown below:



If Highland Elementary was chosen for closure or consolidation, and Lincoln Elementary or Federal Terrace Elementary were chosen as a receiving school, these schools are on the other side of the State 29 freeway. This means that students from the community could not easily walk (if at all) to those receiving schools.

Traffic Conditions: Highland Elementary is challenged by small, one-way streets bordering the school, which result in heightened traffic congestion. Below is a map illustrating the school's entrance:



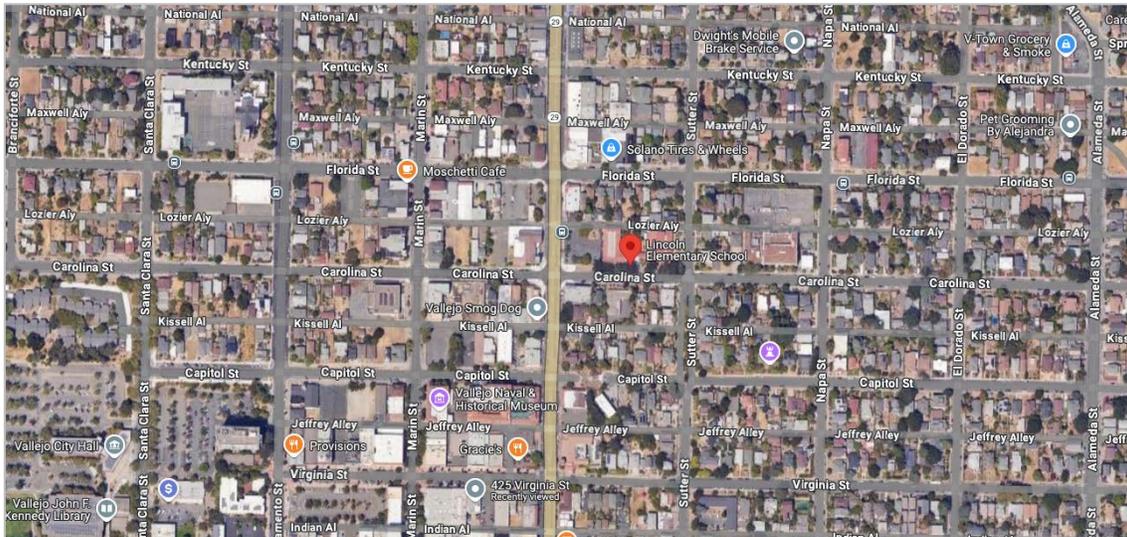
Proximity to Railroad Tracks: None in immediate vicinity.

Any Polluting Industries: None identified.

Conclusion: It can be reasonably concluded that proximity to the freeway is unlikely to have a significant impact on students and would continue to have a less than significant impact if Highland Elementary was selected as a receiving school. However, local roads near Highland Elementary appear to already be burdened by traffic conditions. If Highland Elementary were chosen as a receiver school, there may be impacts on students, and further evaluation would be needed to determine the extent of such impacts.

Lincoln Elementary

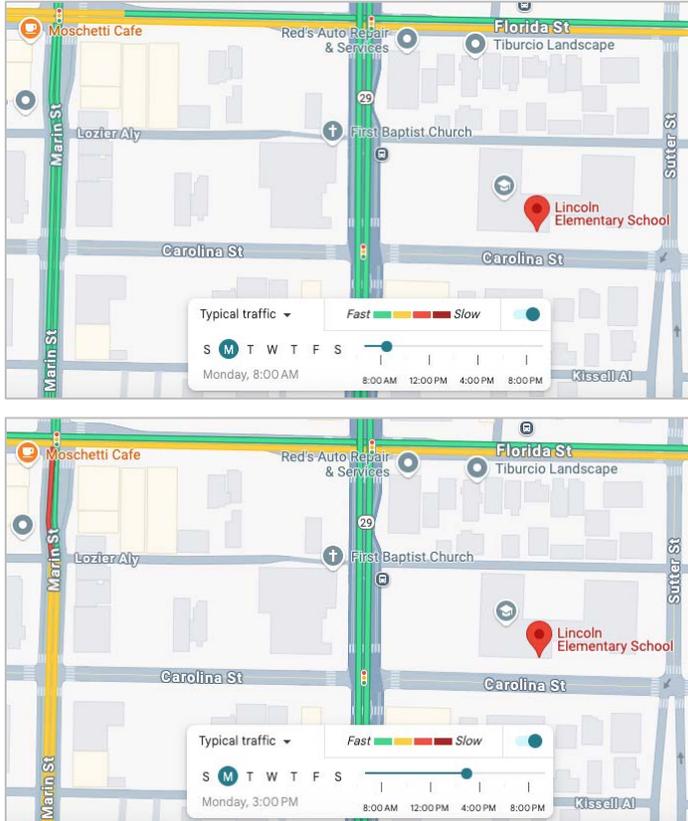
Surrounding Environment: Lincoln Elementary is located in downtown Vallejo approximately ½ mile from City Hall. It is surrounded primarily by single-family residential housing though commercial businesses are also located nearby. A map of the school's location is shown below:



Proximity to Freeways: The school is within three hundred (300 feet) of State 29. However, at this location State 29 has the character of an arterial street and not a freeway; including a reduced speed limit, traffic lights, and marked pedestrian crosswalks.

If Lincoln Elementary was chosen for closure or consolidation, and Federal Terrace Elementary was chosen as a receiving school, this school is on the other side of the State 29. This means that students from the community could not easily walk (if at all) to that receiving school.

Traffic Conditions: The roads near Lincoln Elementary, specifically Florida Street and Marin Street, can suffer from heightened traffic levels around the times that the school's bell schedule begins and ends. Below are maps showing typical traffic congestion at 8:00 a.m. and 3:00 p.m. on a Monday.



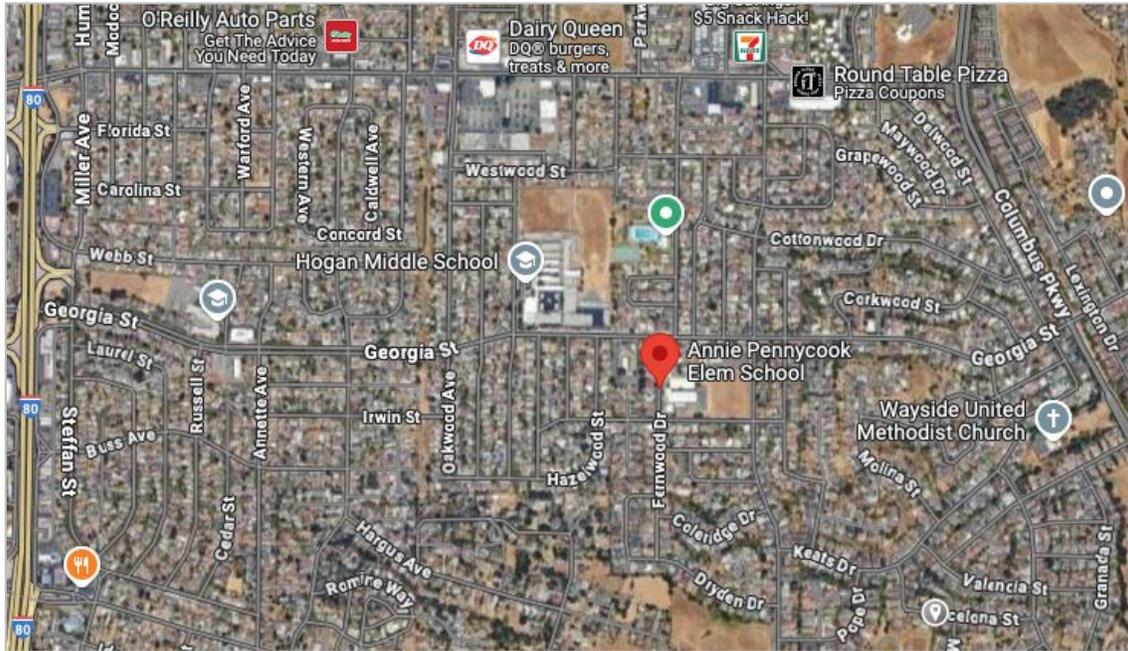
Proximity to Railroad Tracks: None in immediate vicinity.

Any Polluting Industries: None identified.

Conclusion: Although the school is adjacent to State 29, this freeway has the character of an arterial road in this location. Therefore, it can be reasonably concluded that proximity to State 29 is unlikely to have a significant impact on students and would continue to have a less than significant impact if Lincoln Elementary was selected as a receiving school. However, traffic conditions at Lincoln Elementary are already burdened by proximity to State 29. If Federal Terrace Elementary were chosen as a receiving school, there may be traffic impacts on students, and further evaluation would be needed to determine the extent of such impacts.

Pennycook Elementary

Surrounding Environment: Pennycook Elementary is located near Hogan Middle School and otherwise surrounded primarily by single-family residential housing. A map of the school's location is shown below:



Proximity to Freeways: The school is approximately 1 mile east of the Interstate 80 freeway.

Traffic Conditions: No significant traffic identified.

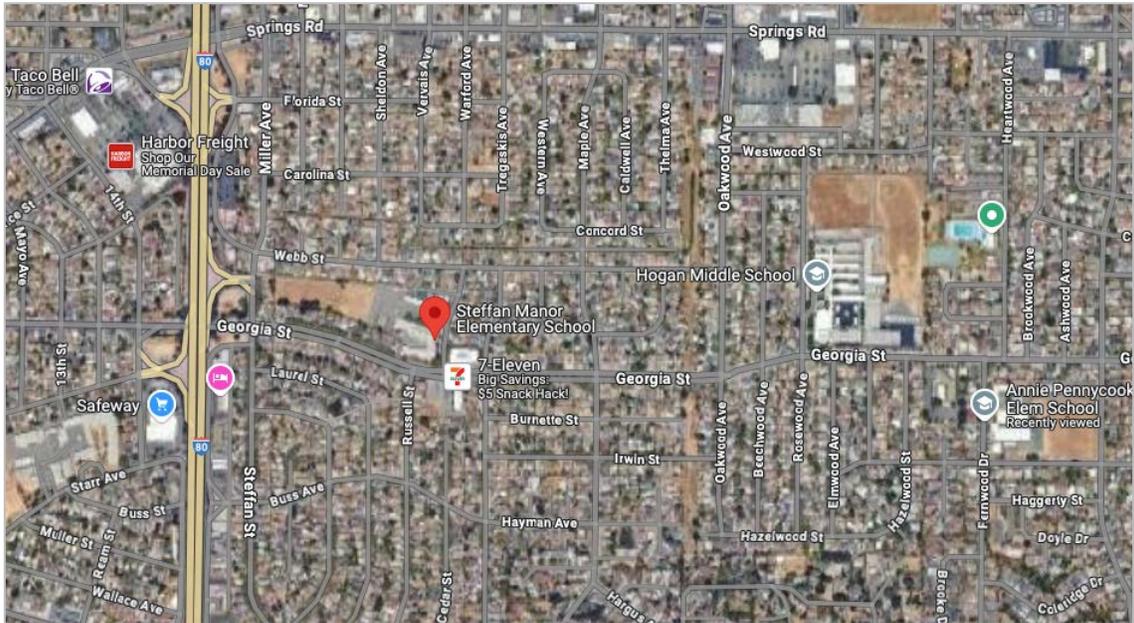
Proximity to Railroad Tracks: None in immediate vicinity.

Any Polluting Industries: None identified.

Conclusion: No environmental considerations were identified. It can be reasonably concluded that environmental conditions at Pennycook Elementary have a less than significant impact on students and would continue to have a less than significant impact if Pennycook was selected as a receiving school.

Steffan Manor Elementary

Steffan Manor Elementary is also located near Hogan Middle School and otherwise surrounded primarily by single-family residential housing. A map of the school's location is shown below:



Proximity to Freeways: The school is a few blocks (approximately one thousand four hundred (1,400) feet) from Interstate 80.

Traffic Conditions: No significant traffic identified.

Proximity to Railroad Tracks: None in immediate vicinity.

Any Polluting Industries: None identified.

Conclusion: No environmental considerations were identified. It can be reasonably concluded that environmental conditions at Steffan Manor Elementary have a less than significant impact on students and would continue to have a less than significant impact if Steffan Manor was selected as a receiving school.

Summary of Environmental Considerations

Below is a summary table of the environmental considerations identified for each potential school closure or consolidation option. The impact resulting from environmental considerations is identified as either negligible (in green) or as a consideration (in yellow). For those options with an impact identified as a consideration, the type of environmental consideration is then specified and either shaded in green (to mean low impact) or shaded in yellow (to mean moderate impact).

<i>School Closure or Consolidation Options Reviewed for EIA</i>		<i>Impact</i>	<i>Type of Impact Identified</i>
1	Cooper Elementary to Highland Elementary	Consideration	Traffic conditions, proximity to freeway
2	Federal Terrace Elementary to Lincoln Elementary (Grades TK-2)	Consideration	Traffic conditions
2a	Federal Terrace Elementary to Cooper Elementary (Grades 3-6)	Consideration	Traffic conditions
2b	Federal Terrace Elementary to Highland Elementary (Grades 3-6)	Consideration	Traffic conditions, proximity to freeway
3a	Finney High (Continuation) to Jesse Bethel High	Negligible	None identified
3b	Finney High (Continuation) to Vallejo High	Negligible	None identified
4a	Highland Elementary to Cooper Elementary	Consideration	Traffic conditions
4b	Highland Elementary to Cooper Elementary and Federal Terrace Elementary	Consideration	Traffic conditions, proximity to freeway
4c	Highland Elementary to Cooper Elementary and Lincoln Elementary	Consideration	Traffic conditions
5a	Lincoln Elementary to Cooper Elementary	Consideration	Traffic conditions
5b	Lincoln Elementary to Federal Terrace Elementary	Consideration	Proximity to freeway
5c	Lincoln Elementary to Highland Elementary	Consideration	Traffic conditions, proximity to freeway
6	Pennycook Elementary to Steffan Manor Elementary	Negligible	None identified
7a	Steffan Manor Elementary to Pennycook Elementary	Negligible	None identified
7b	Steffan Manor Elementary to Pennycook Elementary and Highland Elementary	Consideration	Traffic conditions, proximity to freeway
8a	Federal Terrace Elementary and Lincoln Elementary to Cooper Elementary	Consideration	Traffic conditions
8b	Federal Terrace Elementary and Lincoln Elementary to Highland Elementary	Consideration	Traffic conditions, proximity to freeway

As shown, the primary environmental consideration is traffic conditions, and in some cases, proximity to a freeway.

Traffic condition impacts associated with the closure or consolidation of Lincoln Elementary are expected to be low impact because there are relatively few students that would be traveling to a receiving school. Further, transportation is already provided to the community that serves Lincoln Elementary because students in grades 4 – 6 in that area attend Highland Elementary. This is further detailed in the Transportation Needs section of this report. It is anticipated that transportation would be provided for students in grades TK – 3 as well, were Highland to be a receiving school, reducing the volume of additional traffic congestion from a consolidation. A similar outcome would be expected if Cooper were to be a receiving school.

Options involving the closure of Cooper Elementary, Federal Terrace Elementary, and Highland Elementary are anticipated to have moderate impacts. More specifically, the closure of Cooper Elementary may put substantial burden on the receiving school, Highland Elementary, in accommodating increased traffic. The closure of Federal Terrace Elementary is likely to increase traffic conditions at the receiving schools as well, particularly since the receiving schools are not easily walkable (if walkable at all) from the community. Finally, the closure of Highland Elementary is anticipated to worsen traffic conditions given the school’s relatively high enrollment and the already significant traffic conditions at the receiving schools.

(6) STUDENT DEMOGRAPHICS

Student demographics are reviewed to assess whether closure would disproportionately impact any particular demographic group. The review is to include consideration of students' race or ethnicity, students who are English learners, homeless and foster youth, and students with disabilities.

This EIA considers demographics prior to school closure or consolidation to gauge whether there would be a disproportionate impact on any particular demographic group, as well as following implementation of school closure or consolidation to understand whether the implementation would intensify demographic isolation or result in an especially high concentration of any particular demographic group.

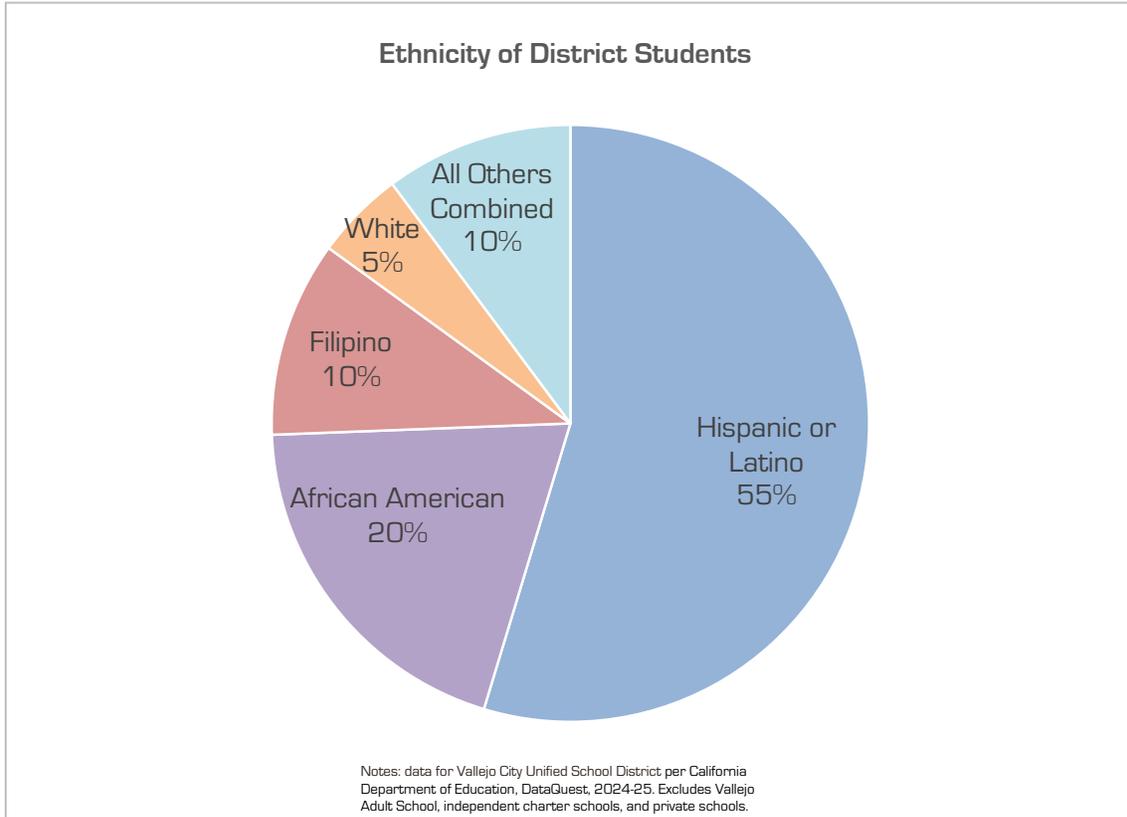
To assess whether any school reviewed for EIA has a disproportionate impact on any particular demographic group, the following parameters were used:

- Whether the school has a higher percentage of students in any particular demographic group as compared to other District schools not under review for this EIA, and
- Whether the school's percentage of students in any particular demographic group is significantly higher (at least ten percent (10%) above) the Districtwide average across all schools.

Following implementation of the school closure or consolidation options, a determination is made as to whether the concentration of students being assessed reaches a significantly high level. The parameters for defining a significantly high level are, for purposes of this analysis, established at the same thresholds; whether the school has a higher percentage as compared to other District schools not under review for this EIA, and whether the school's percentage is significantly higher (at least ten percent (10%) above) than the Districtwide average across all schools.

Ethnicity

The chart below illustrates the composition of students' ethnicity within the District:

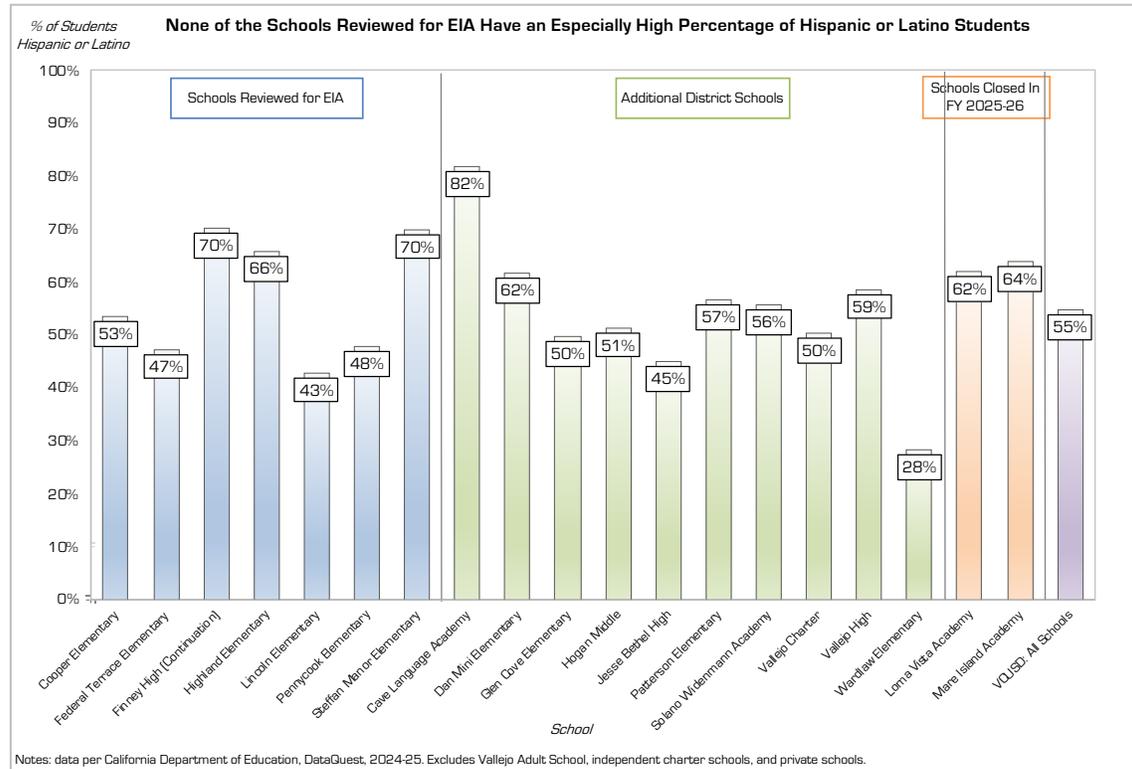


Given the results of the above, the major ethnicities (based on a significance threshold of at least ten percent (10%)) were selected for analysis. Potential impacts are discussed in more detail for each of the following ethnicities:

- Hispanic or Latino
- African American
- Filipino

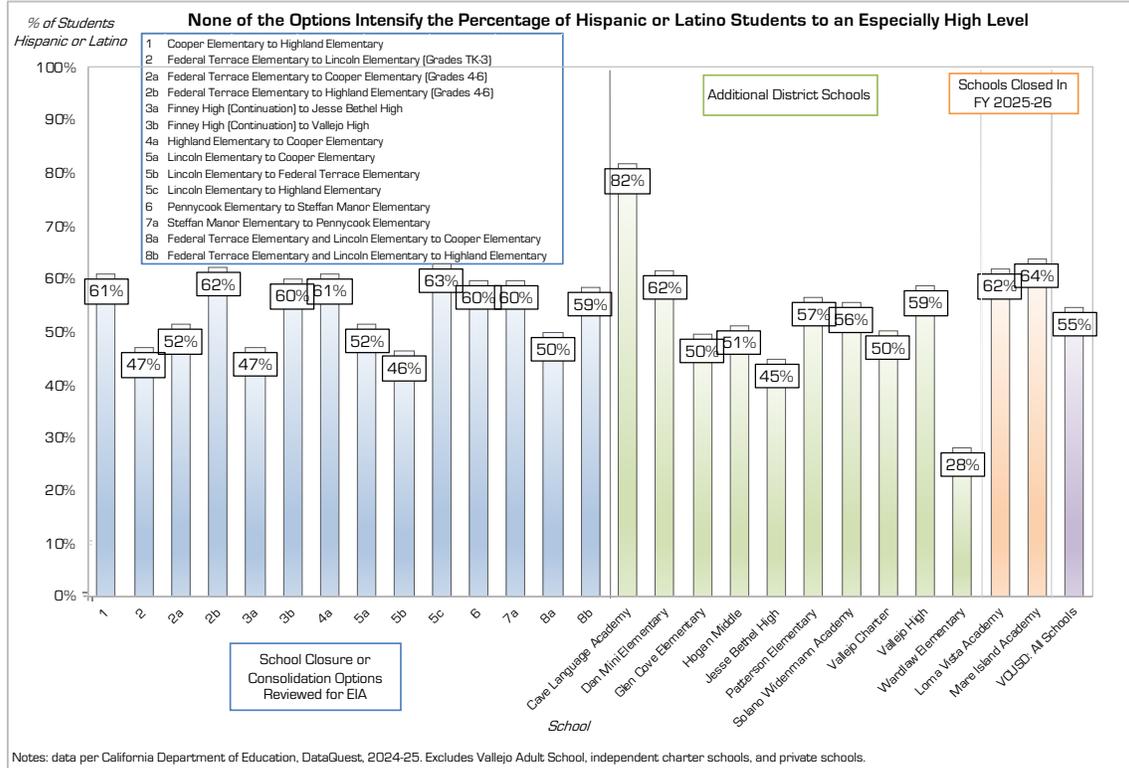
Hispanic or Latino

The chart below illustrates the percentage of students at each school within the District whose ethnicity is Hispanic or Latino.



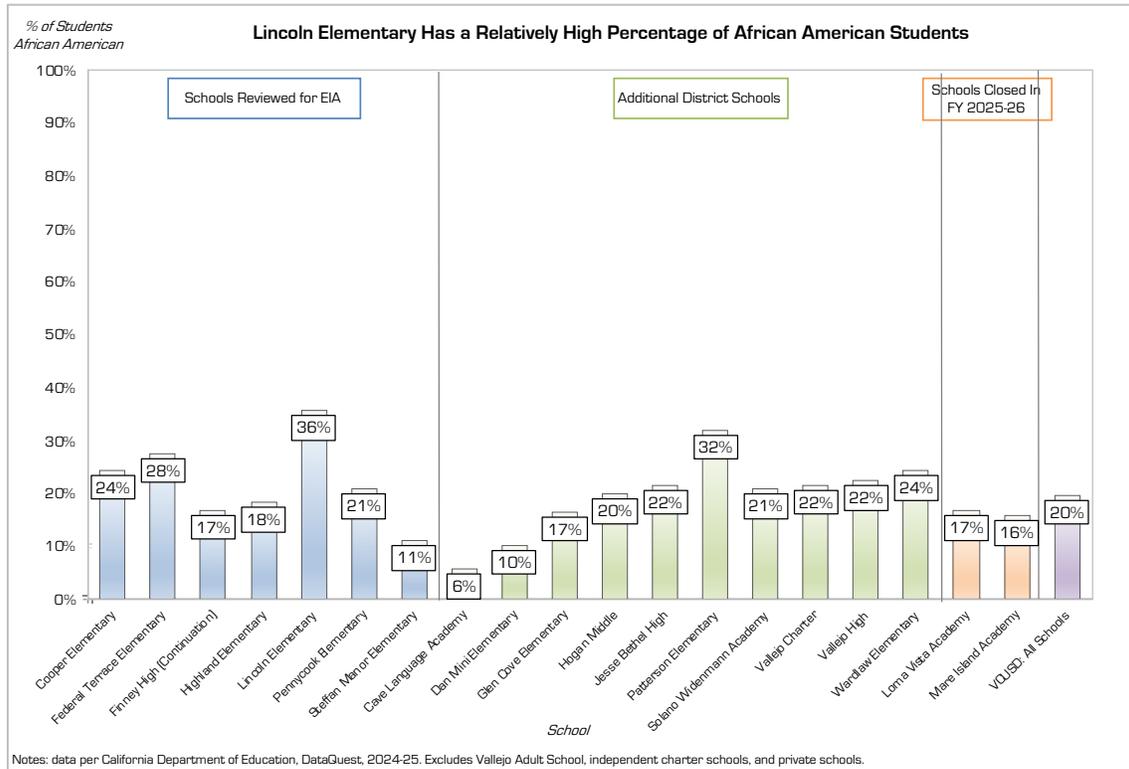
As shown, none of the schools reviewed for EIA have a significantly high percentage of Hispanic or Latino students compared to the other schools within the District. In particular, a school not under consideration in this EIA, Cave Language Academy, has a percentage of Hispanic or Latino students that is significantly greater than the schools under consideration. It can be reasonably concluded that this was not a factor in determining which schools to evaluate in this EIA.

Following implementation of the school closure or consolidation options, none of the options result in an intensification of the percentage of Hispanic or Latino students attending each school to a level that is significantly high in comparison to the other District schools. The resulting outcome of the percentage of Hispanic or Latino students at each school is illustrated in the chart below.



African American

The chart below illustrates the percentage of students at each school within the District whose ethnicity is African American.

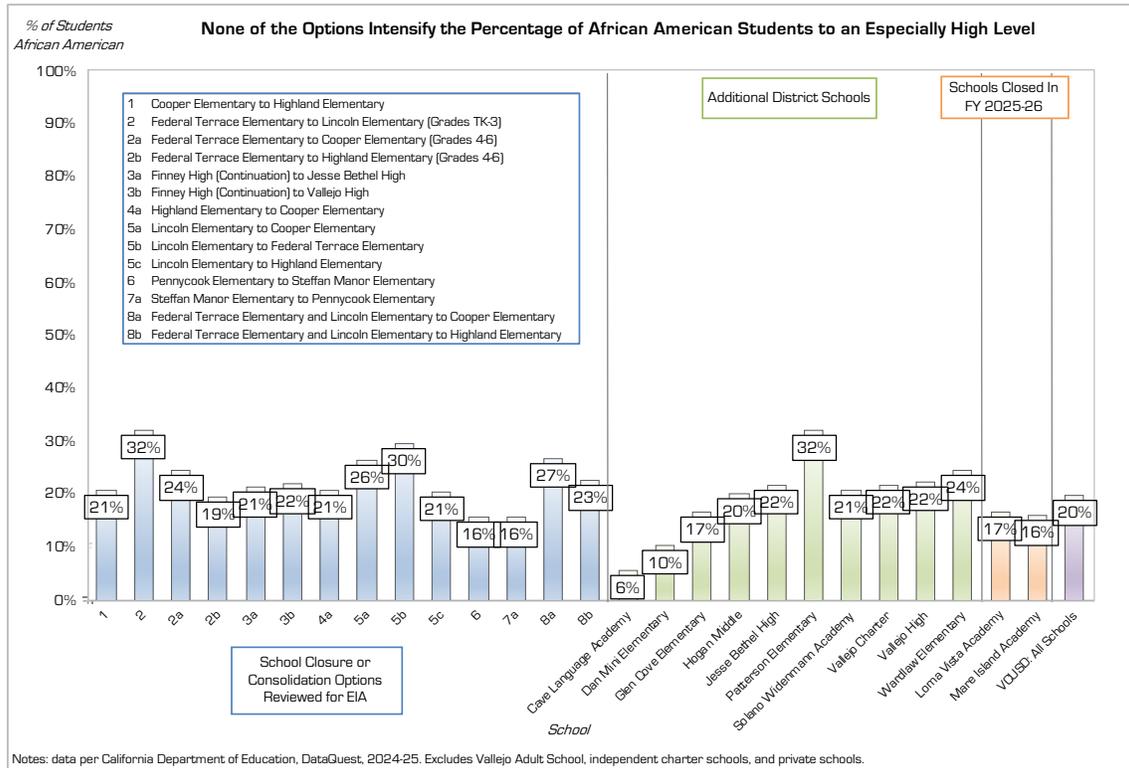


As shown, Lincoln Elementary has the highest percentage of African American students within the District; however, a school not under consideration in this EIA, Patterson Elementary, also has a similar level of African American students. Further, nearly half the schools under consideration for consolidation or closure in this EIA have a percentage of African American students that is below the District’s average. It can be reasonably concluded that this was not a factor in determining which schools to evaluate in this EIA

Additionally, it is important to note in all comparisons including Lincoln Elementary, that Lincoln Elementary serves a relatively small number of students, a relatively few number of grades, and differences from Districtwide averages are also explainable by natural variance expected from a smaller sample size of students. Moreover, it is important to note that given the differences in school sizes, a school with a higher percentage of students who are in an examined group does not necessarily mean that the school serves a higher number of total students that are within such group.

To conclude, although Lincoln Elementary has a high percentage of African American students in comparison to other District schools, when considering the absolute number of students in such demographic group in comparison to Lincoln’s small school size, the closure of Lincoln Elementary will not have a disproportionate impact on that group as a whole.

Following implementation of the school closure or consolidation options, none of the options result in an intensification of the percentage of African American students attending each school to a level that is significantly high in comparison to the other District schools. That said, the percentages remain elevated for options involving Lincoln Elementary. The resulting outcome at each school is illustrated in the chart below. Additionally, any option which results in the closure or consolidation of Lincoln Elementary will result in greater diversification of African American students across the District's remaining schools.

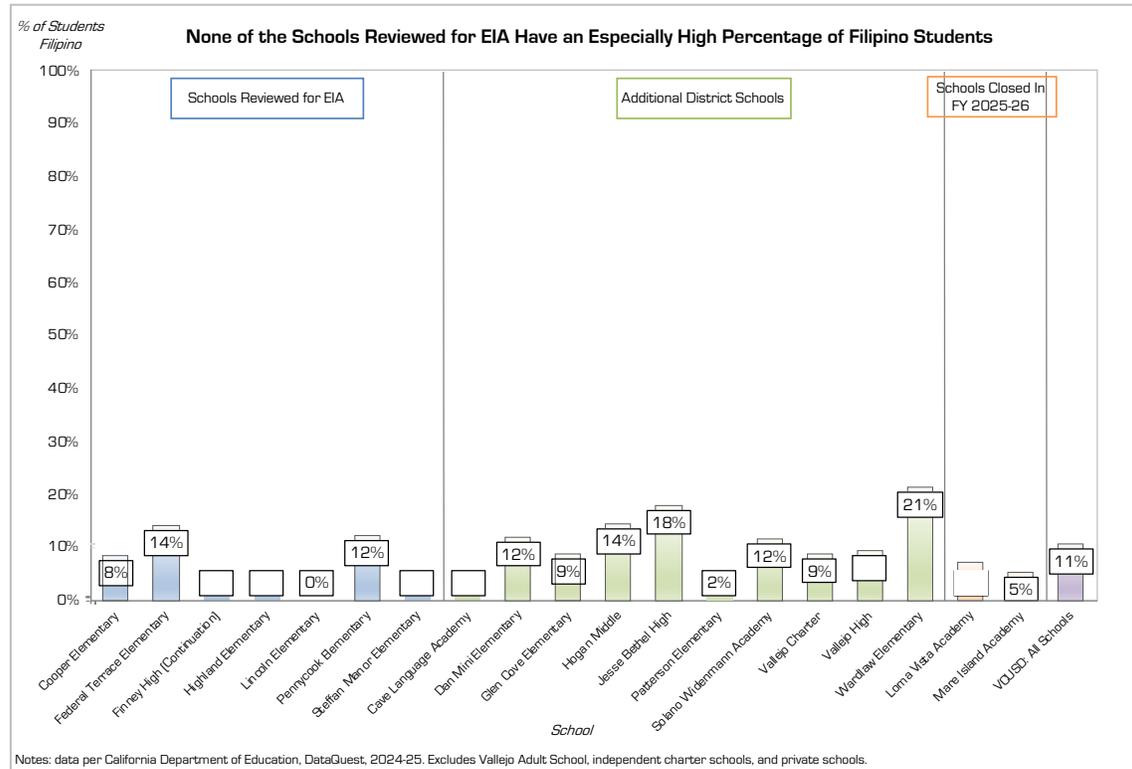


Given Lincoln Elementary's 'relatively high percentage of African American students and the potential for a disproportionate impact on students of a certain race, the following additional analysis must also be considered for closing or consolidating the school:

- Whether it's necessary to meet legitimate educational goals. Closing or consolidating the school would achieve several educational goals including:
 - Increasing the number of students at the school site to allow diversification of student cohorts and reduction in the need for combination classes that combine grade levels
 - Increasing the number of teachers at the school site to allow for increased teacher collaboration
- Whether there are comparable alternatives with less disproportionate impact. There are no comparable alternatives to Lincoln Elementary given its unique characteristics:
 - Undersized enrollment serving only seventy (70) students in the school in FY 2024-25
 - Offering education to just a few early grade levels, currently serving TK – 3
- Whether closing or consolidating the school maintains or intensifies racial isolation. Closing or consolidating the school would not maintain or intensify racial isolation:
 - Consolidation with Federal Terrace, consolidation with Cooper Elementary and consolidation with Highland all lead to more distribution of African American students across the District's remaining school sites, resulting in greater diversification of the student demographics.

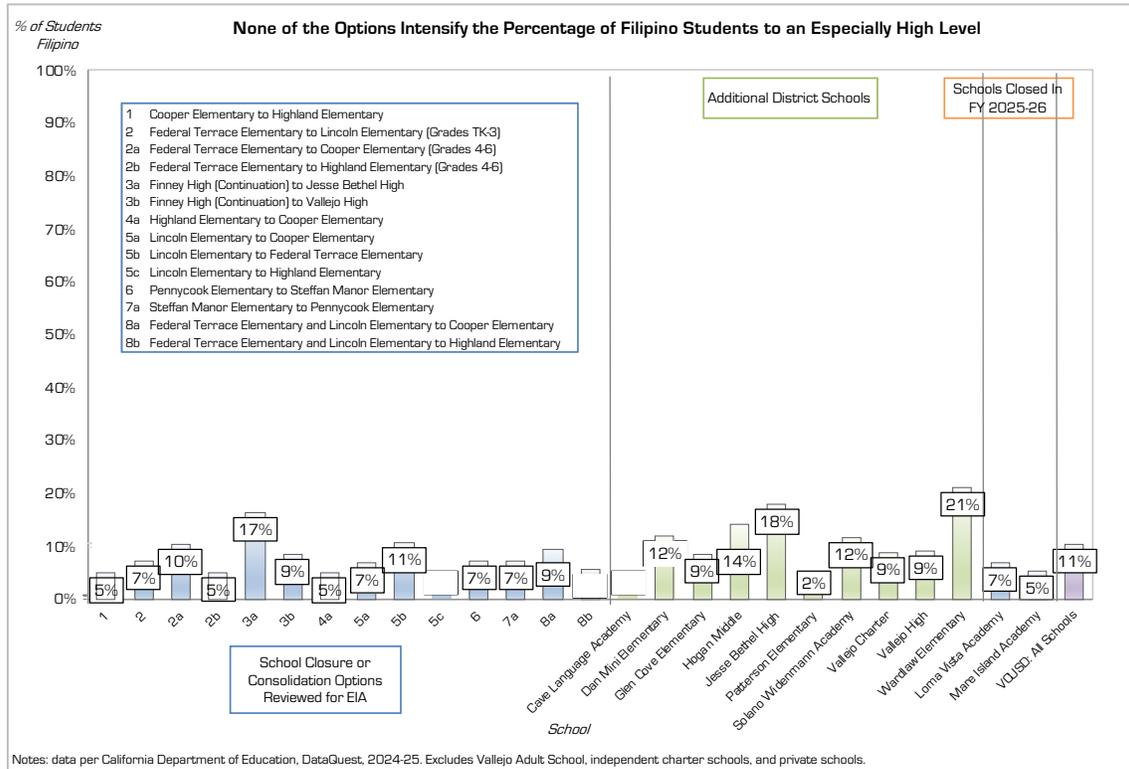
Filipino

The chart below illustrates the percentage of students at each school within the District whose ethnicity is Filipino.



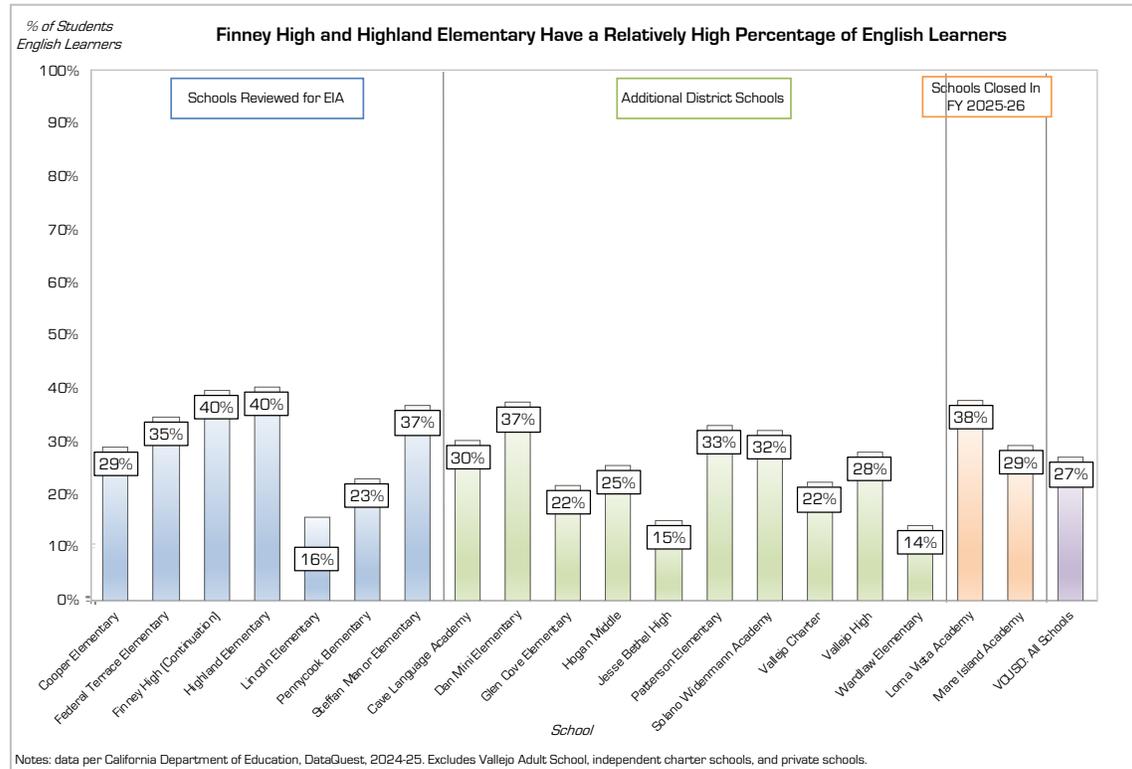
As shown, none of the schools reviewed for EIA have an especially high percentage of Filipino students compared to the other schools within the District. It can be reasonably concluded that this was not a factor in determining which schools to evaluate in this EIA.

Following implementation of the school closure or consolidation options, none of the options result in an intensification of the percentage of Filipino students attending each school to a level that is significantly high in comparison to the other District schools. The resulting outcome of the percentage of Filipino students at each school is illustrated in the chart below.



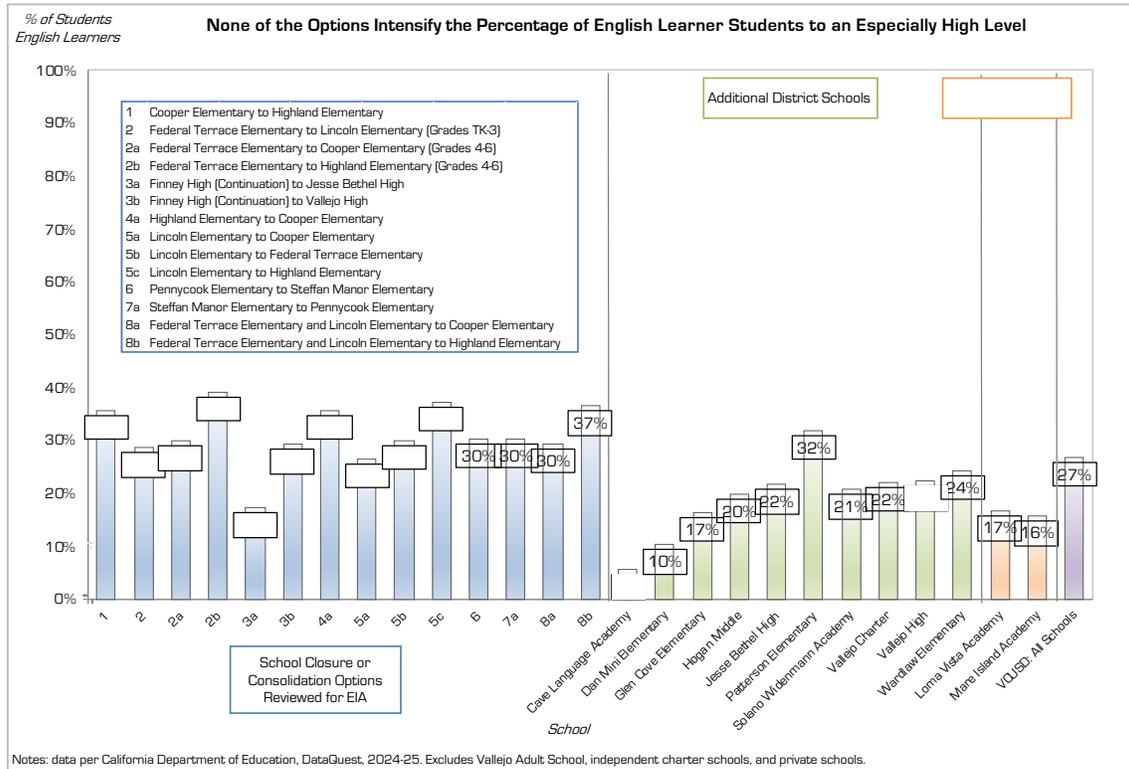
English Learners

The chart below illustrates the percentage of students at each school within the District who are English learners.



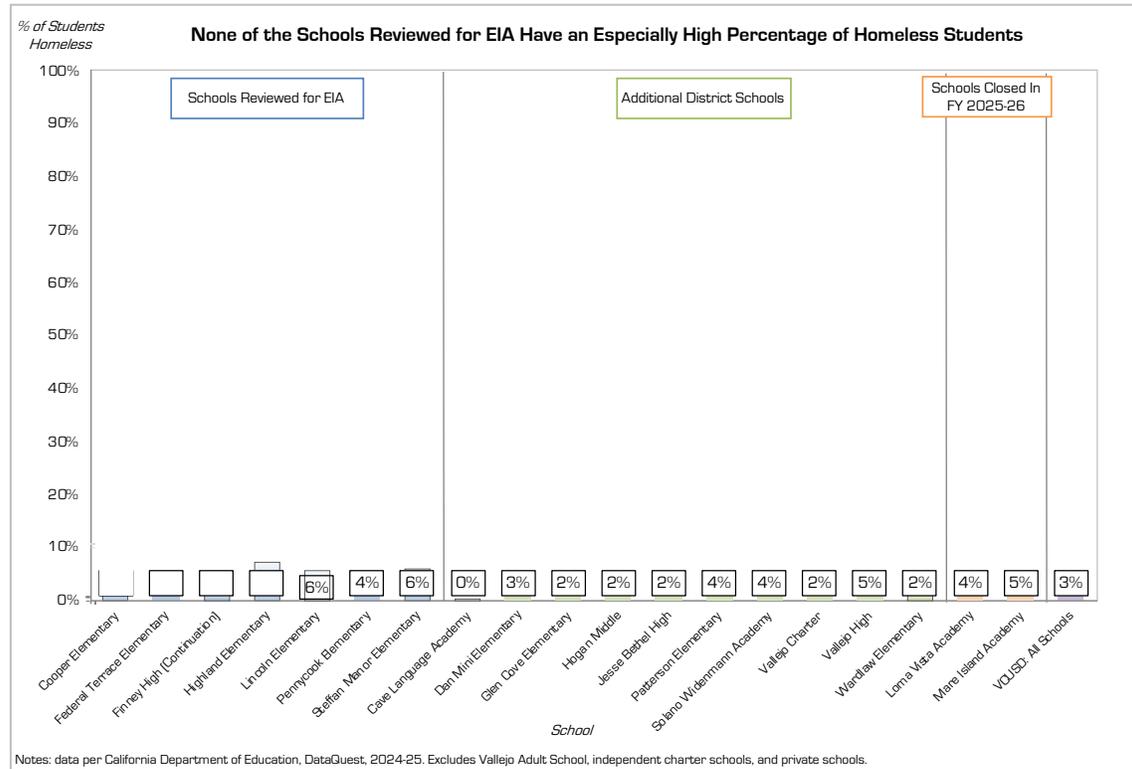
As shown, John Finney High and Highland Elementary have the highest percentage of students who are English learners within the District. However, a school not under consideration in this EIA, Dan Mini Elementary, also has a similar level of students who are English learners. Further, multiple schools under consideration for consolidation or closure in this EIA have a percentage of students who are English learners that is below the District's average. It can be reasonably concluded that this was not a factor in determining which schools to evaluate in this EIA

Following implementation of the school closure or consolidation options, none of the options result in an intensification of the percentage of English learner students attending each school to a level that is significantly high in comparison to the other District schools. The resulting outcome of the percentage of English learner students at each school is illustrated in the chart below.



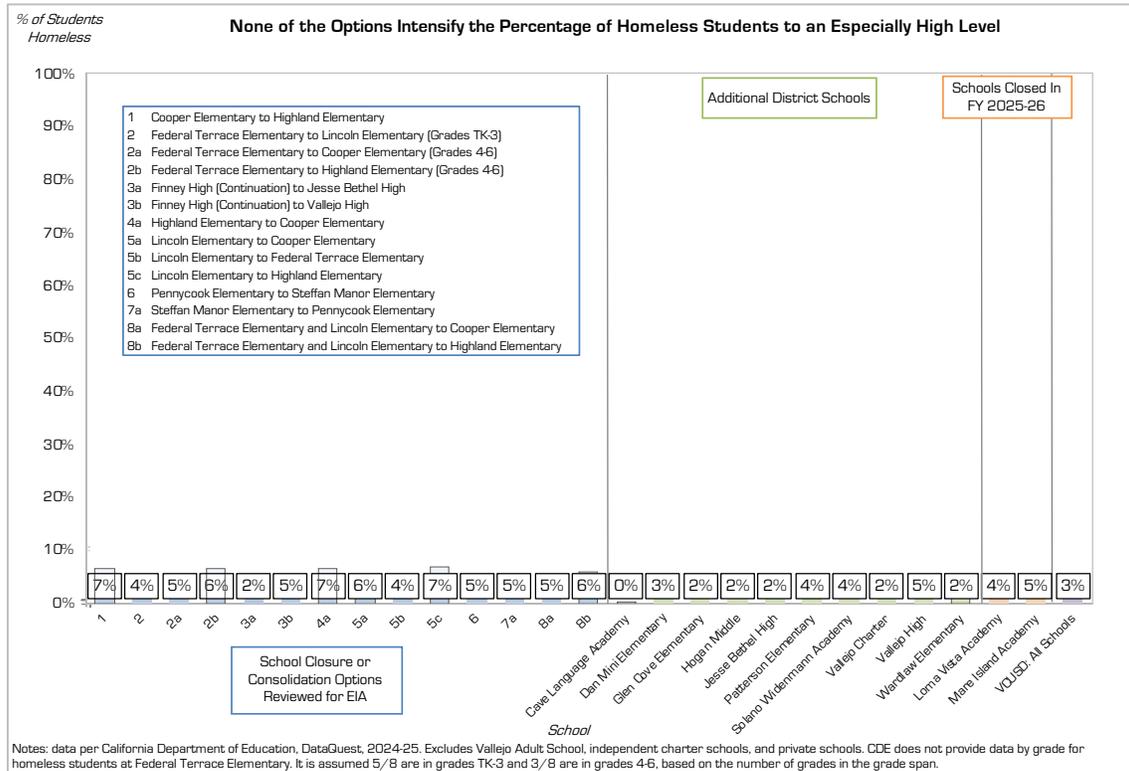
Homeless Students

The chart below illustrates the percentage of students at each school within the District who are homeless.



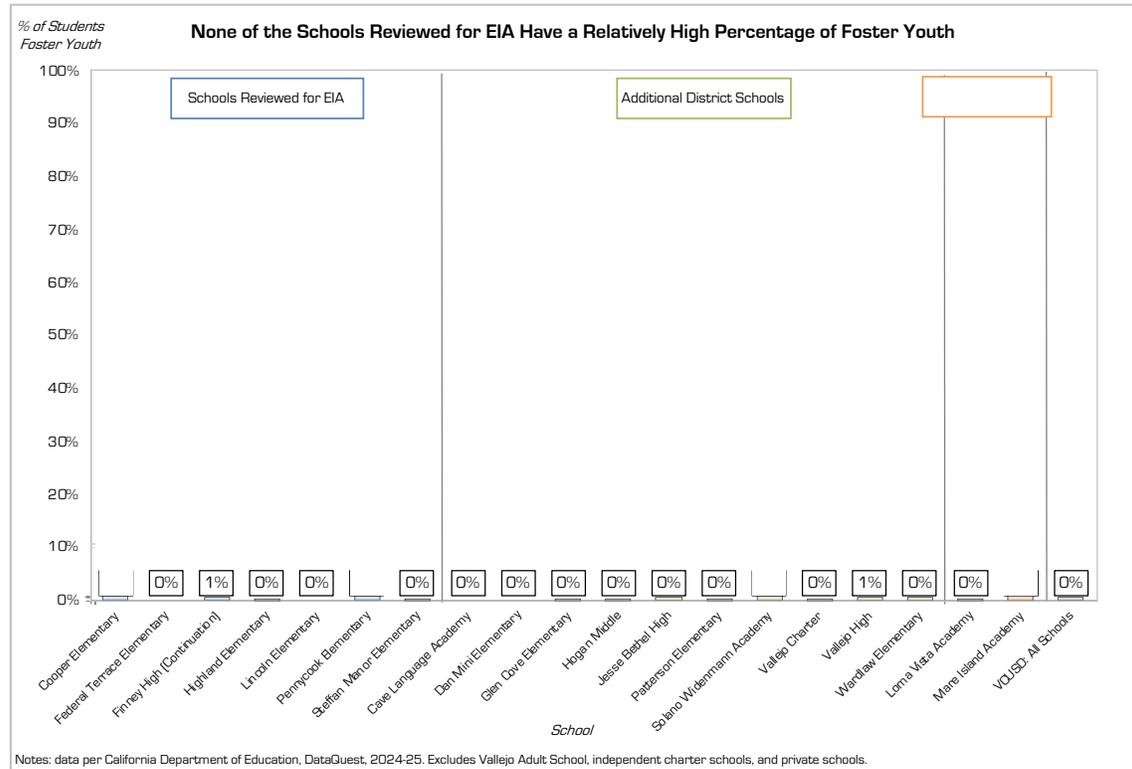
As shown, none of the schools reviewed for EIA have an especially high percentage of homeless students compared to the other schools within the District. It can be reasonably concluded that this was not a factor in determining which schools to evaluate in this EIA.

Following implementation of the school closure or consolidation options, none of the options result in an intensification of the percentage of homeless students attending each school to a level that is significantly high in comparison to the other District schools. The resulting outcome of the percentage of English learner students at each school is illustrated in the chart below.



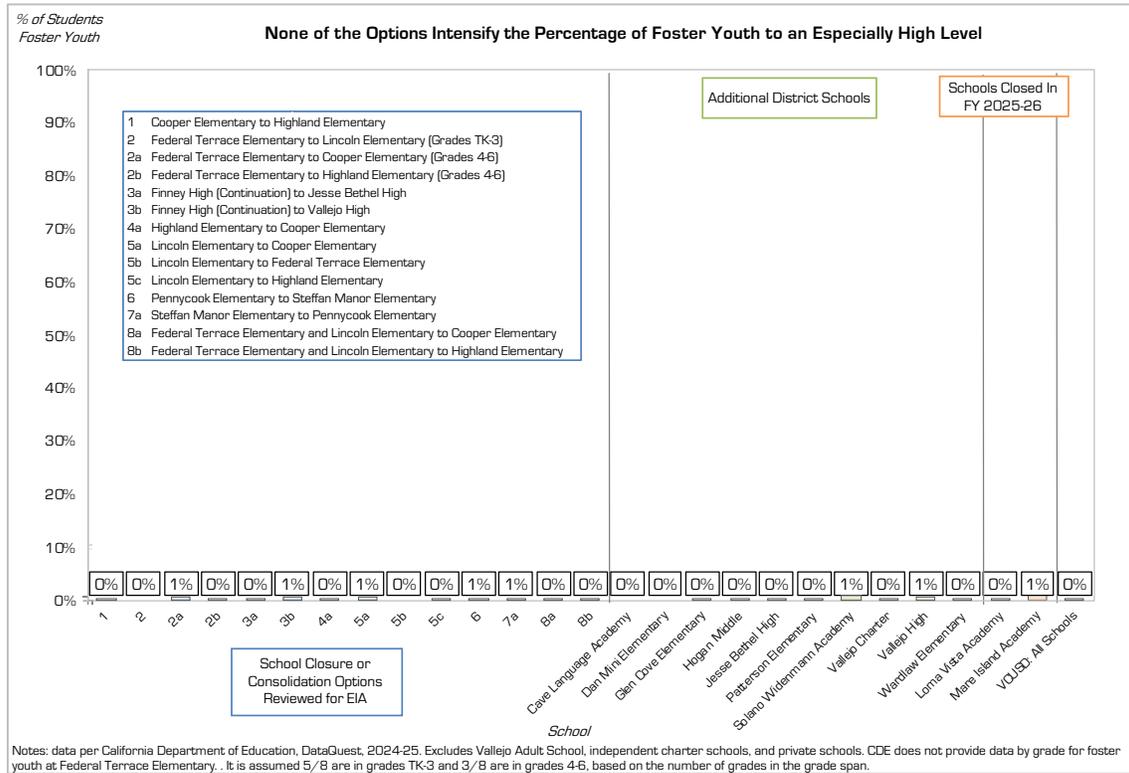
Foster Youth

The chart below illustrates the percentage of students at each school within the District who are foster youth.



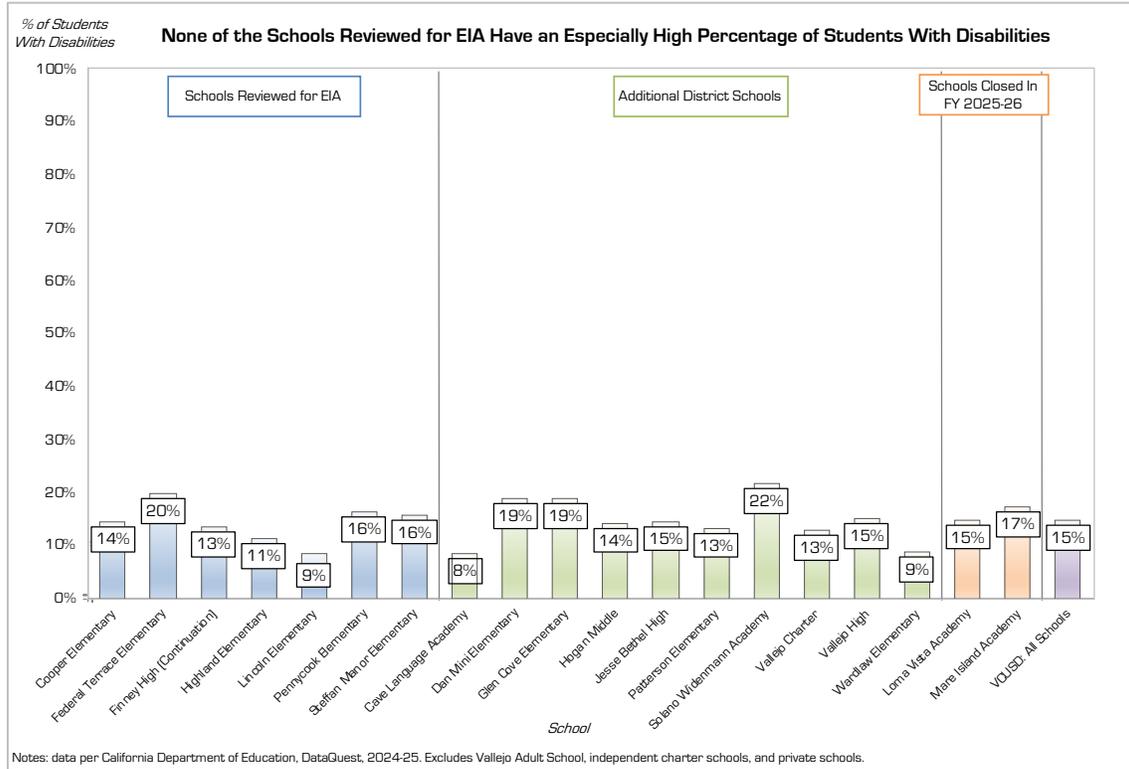
As shown, none of the schools reviewed for EIA have an especially high percentage of students who are foster youth compared to the other schools within the District. It can be reasonably concluded that this was not a factor in determining which schools to evaluate in this EIA.

Following implementation of the school closure or consolidation options, none of the options result in an intensification of the percentage of students who are foster youth attending each school to a level that is significantly high in comparison to the other District schools. The resulting outcome of the percentage of foster youth at each school is illustrated in the chart below.



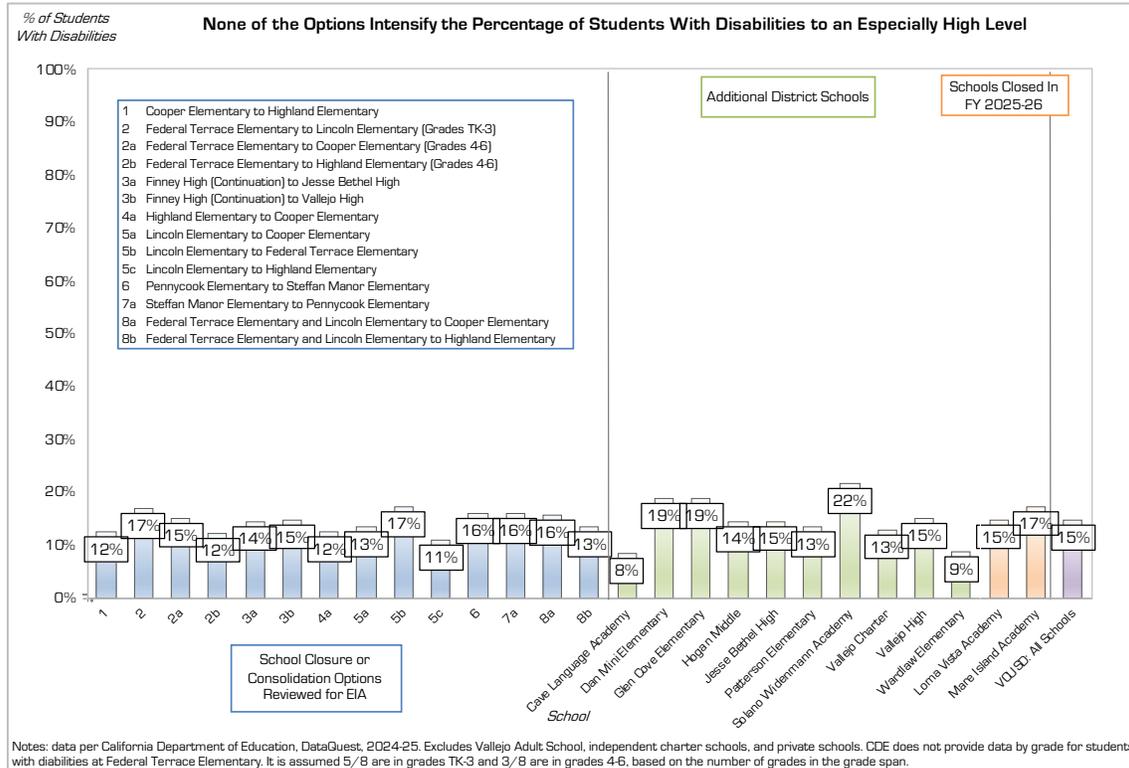
Students With Disabilities

The chart below illustrates the percentage of students at each school within the District with disabilities.



Students with disabilities is being shown for all disabilities including both physical and intellectual. As shown, none of the schools reviewed for EIA have a significantly high percentage of students with disabilities compared to the other schools within the District. It can be reasonably concluded that this was not a factor in determining which schools to evaluate in this EIA. Additionally, all potential receiving schools have experience accommodating special education programs and serving special education students.

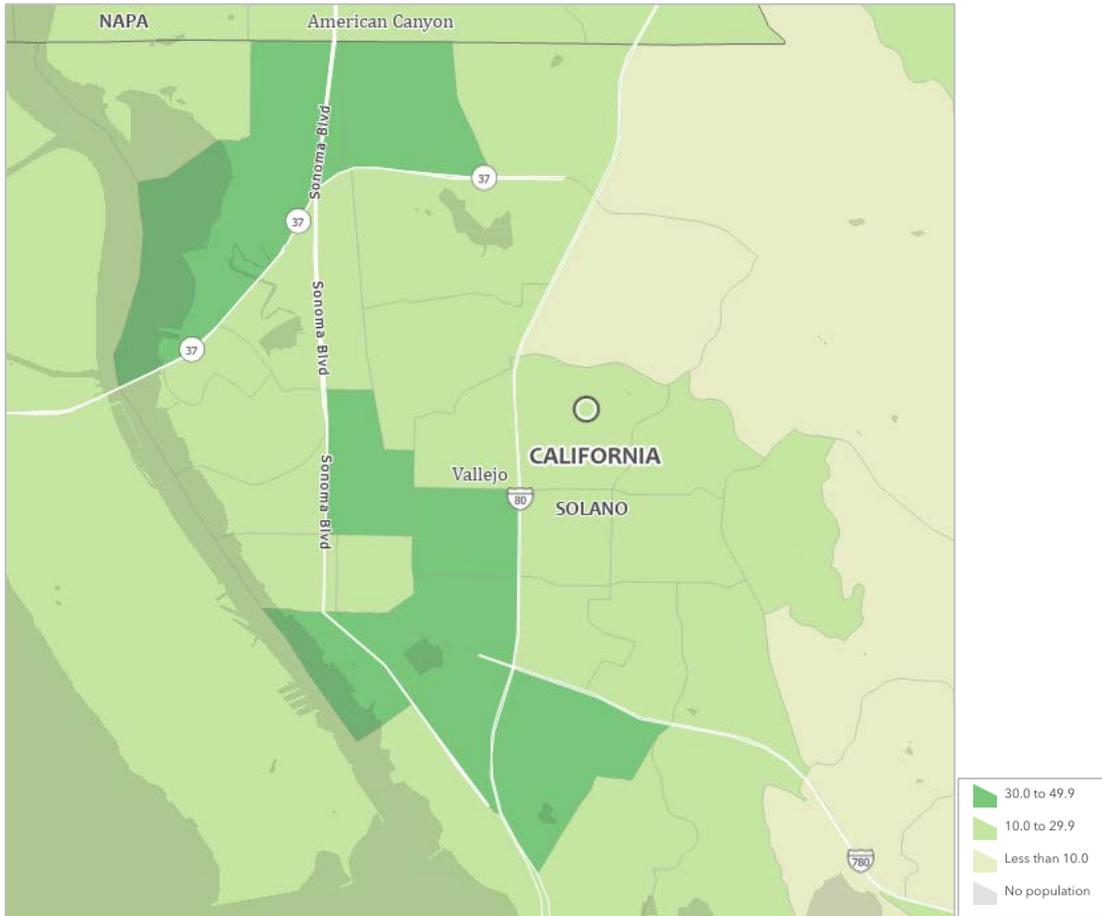
Following implementation of the school closure or consolidation options, none of the options result in an intensification of the percentage of students with disabilities attending each school to a level that is significantly high in comparison to the other District schools. The resulting outcome of the percentage of students with disabilities at each school is illustrated in the chart below.



The ethnic composition of neighborhoods is reviewed to consider whether closure or consolidation would disproportionately impact a neighborhood involving any particular demographic group. While not specified in law, the California Attorney General recommends that the analysis consider the impacts on demographic groups, and whether disparities are the result of segregation and neighborhood enrollment boundaries.⁶ The residences of various demographic groups are illustrated in the maps below.⁷

Hispanic or Latino

The map below illustrates the percentage of residents whose ethnicity is Hispanic or Latino.

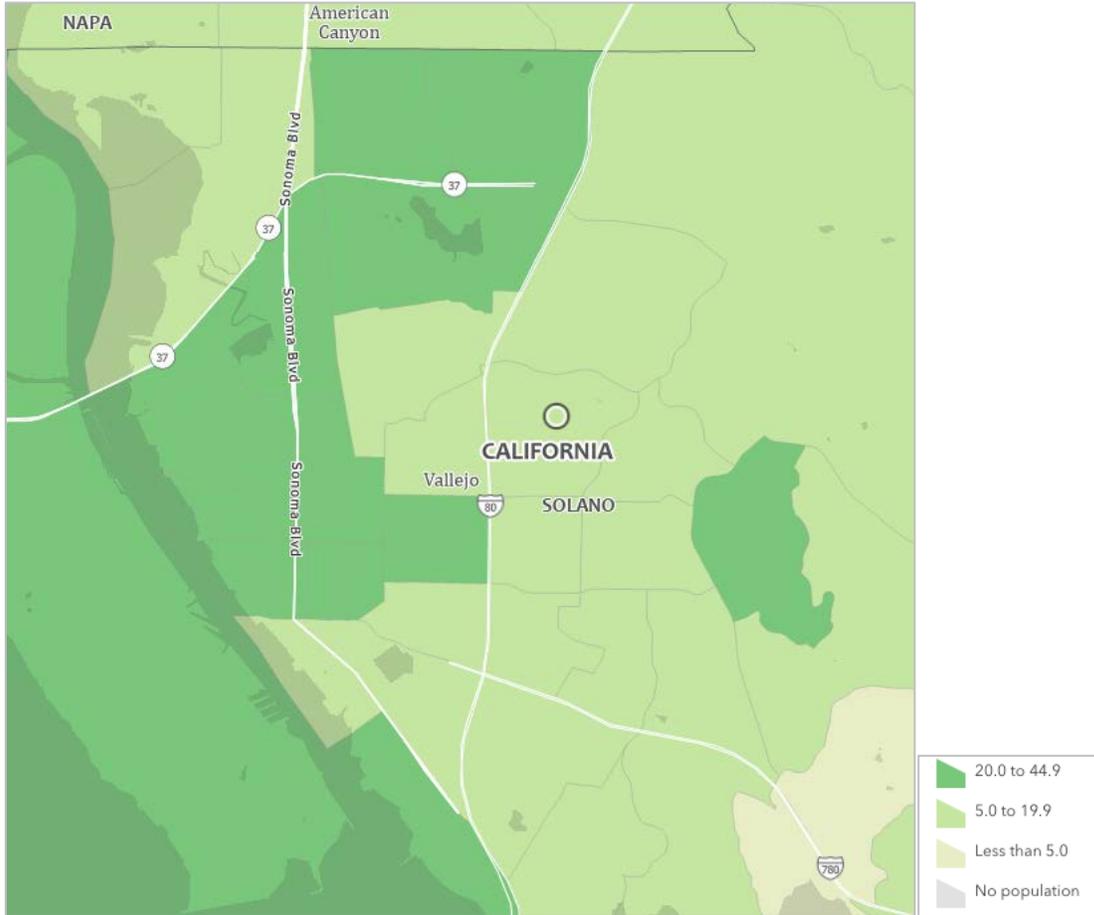


⁶ State of California, Office of the Attorney General Rob Bonta, "Guidance Regarding Laws Governing School Closures and Best Practices for Implementation in California," April 11, 2023.

⁷ Maps (including color gradation and scale) per United States Census Bureau, 2020 Census Demographic Data Map Viewer.

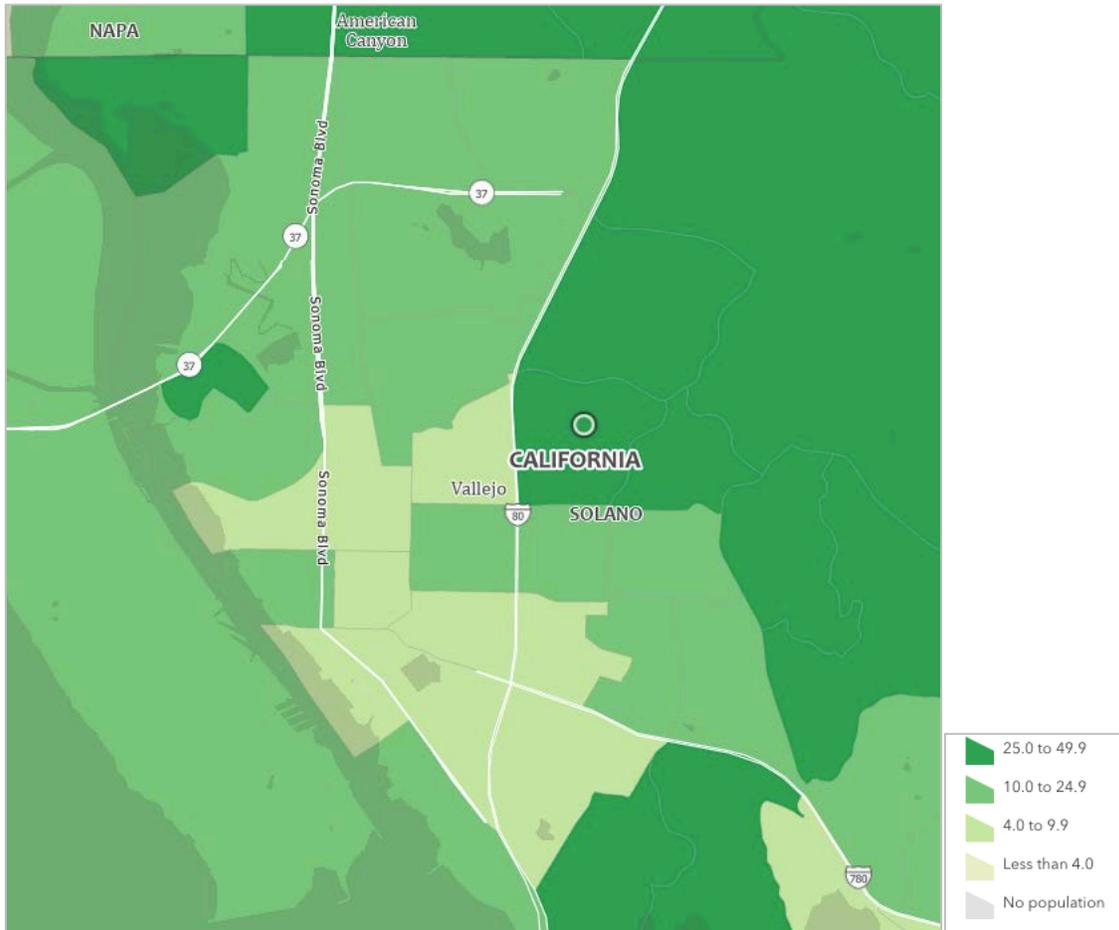
African American

The map below illustrates the percentage of residents whose race is African American.



Asian

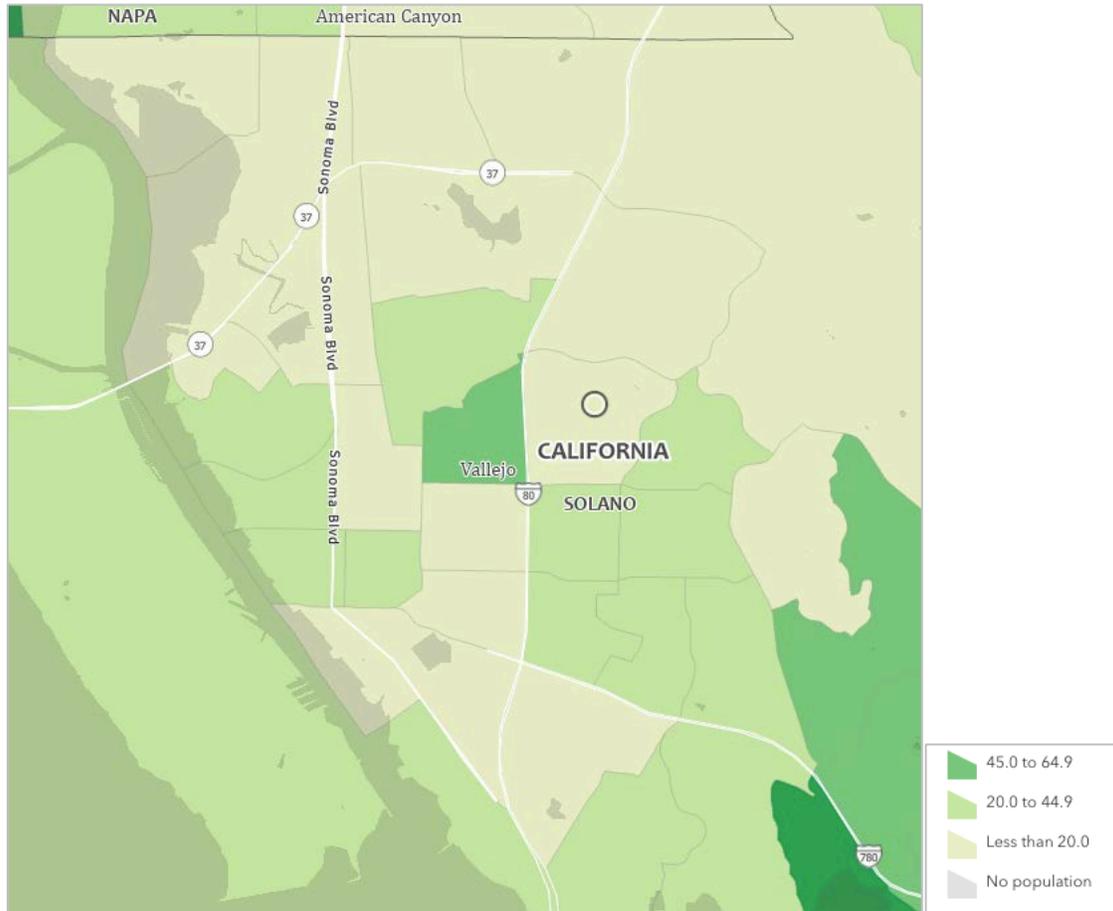
The map below illustrates the percentage of residents whose race is Asian.⁸



⁸ The specific ethnicity of Filipino is not provided by the United States Census Bureau, 2020 Census Demographic Data Map and so, for purposes of this analysis, Asian is used as a proxy.

White

The map below illustrates the percentage of residents whose race is White.



In reviewing the residential locations of the District's primary demographic groups, it can be seen that the diversity of the District is so great that large swaths of the District's territory are occupied by these groups. As a result, there does not appear to be a particular neighborhood with a high concentration of a specific ethnicity that would be disproportionately impacted (in comparison to others) by school closure or consolidation. Rather, it appears that the options under review for the EIA all involve impacts to these groups, with no particular ethnicity impacted in a meaningfully disproportionate way than others. It can be reasonably concluded that the ethnic composition of specific neighborhoods was not a factor in determining which schools to evaluate in this EIA.

(7) TRANSPORTATION NEEDS

Transportation needs are reviewed to assess whether closure or consolidation would disproportionately and discriminatorily impact a neighborhood involving any particular demographic group.

Under the District's current Board policies and administrative regulations, home to school transportation services are provided to students under the following circumstances:⁹

- Students with disabilities as specified with IEP or have a Section 504 Plan
 - 247 students
- Students living beyond minimum distance per Board policy
 - 255 students
- Students lacking permanent housing
 - 11 students
- Overflow students living beyond walking boundary from the assigned school
 - 37 students

Pursuant to Board Policy 3541, Transportation Routes and Services, the minimum distance guidelines are as follows:

"Students shall be eligible for transportation service to and from school if the distance between their school- established bus stop and the school is beyond the minimum listed below:

- Grades K-5: one and one-half (1.5) miles
- Grades 6-8: two and one-quarter (2.25) miles
- No transportation services for high school.

Safety is also considered for the path of travel from neighborhoods to schools. For example, if walking to school may involve crossing across a freeway or over a bridge, the District has provided a bus stop in the neighborhood to accommodate transportation. Path of travel has not been evaluated for purposes of this EIA but may be subject to further consideration.

In addition to the mandated services, the District also provides optional services that are based on a priority list and subject to available capacity, which involve an application process.

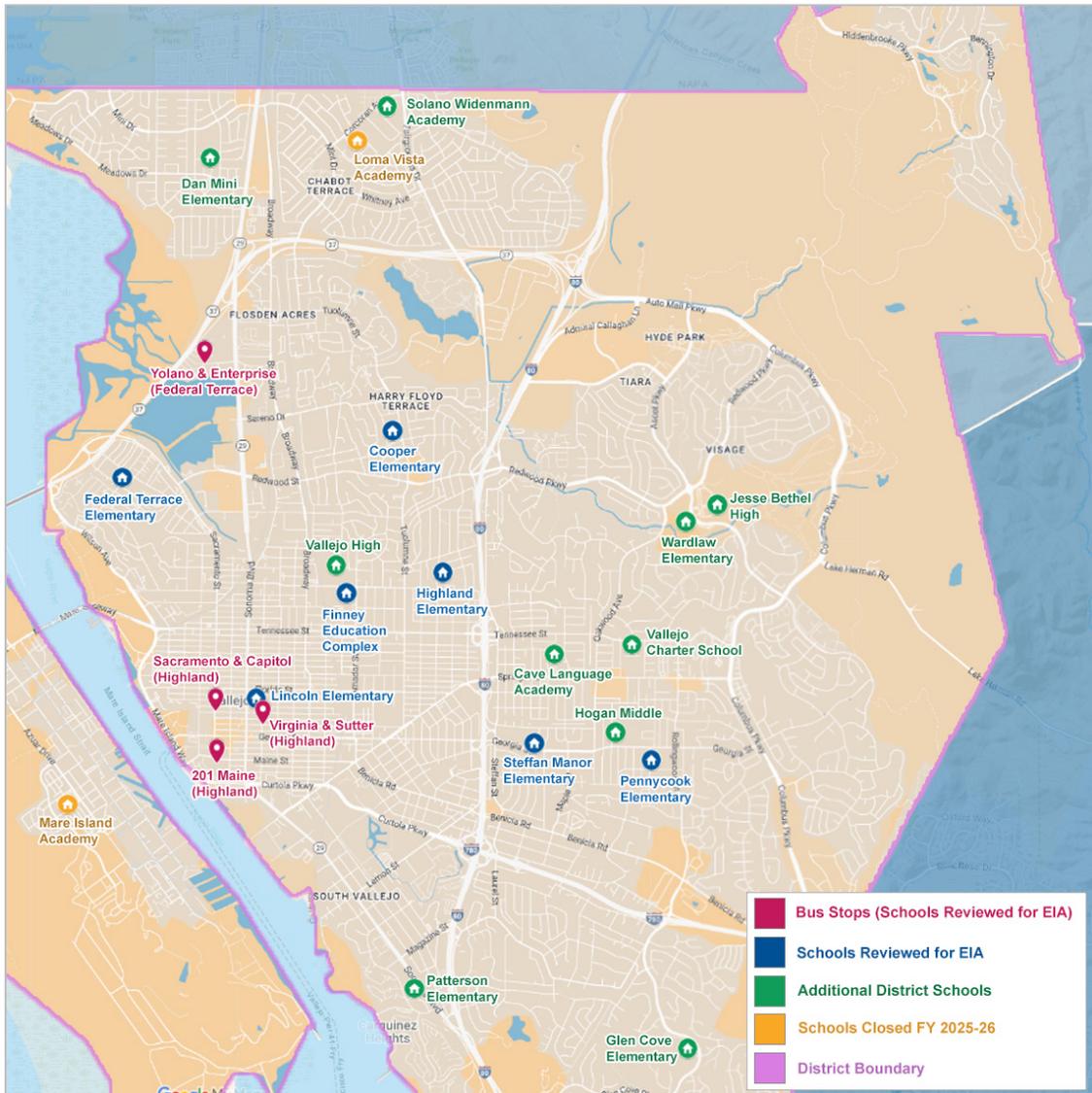
The FY 2024-25 expenses for transportation were four and one-half million (\$4,500,000) dollars and involve the following:

- Central staff: Director, Secretary, Dispatcher/Scheduler, Driver Trainer, Mechanics, and Vehicle Maintenance Monitor (9 staff)
- Bus drivers (25 staff)
- Bus fleet (31 buses)

Approximately 2/3 of the expenses are for staff salaries and benefits, with the remaining 1/3 for supplies and other operating expenses.

⁹ Vallejo City Unified School District, Transportation Plan 2024-2027, Governing Board Approved March 22, 2023. Number of students is for FY 2024-25 per District Department of Operations, Transportation.

Below is a map highlighting the locations of bus stops for the schools under review for this EIA:



It can be seen the District currently provides one bus stop serving Federal Terrace Elementary and three bus stops serving Highland Elementary (for the students in the Elementary area that are in grades 4-6). No bus stops are provided for the other schools that are under review for this EIA.

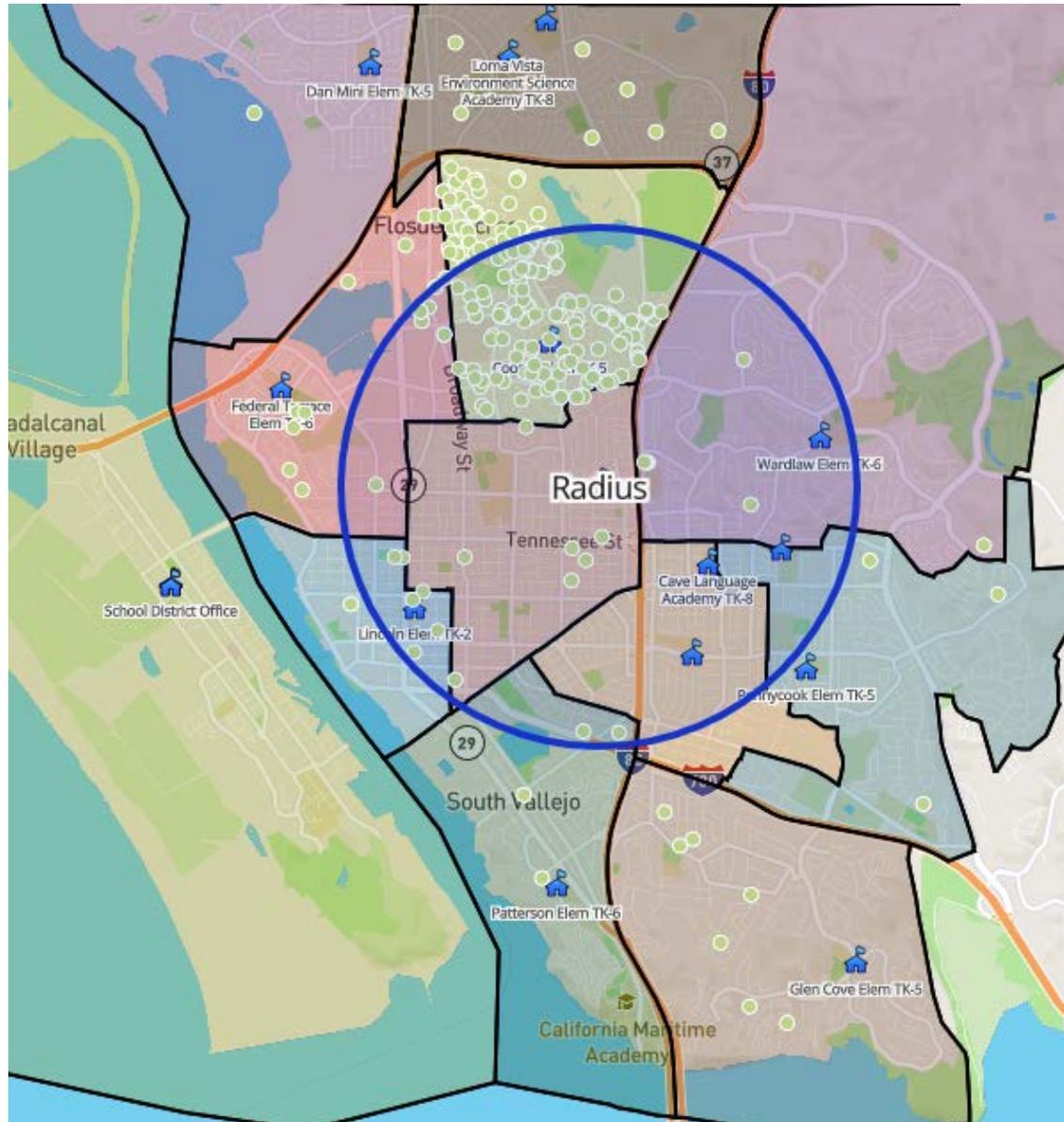
The table below identifies the distances between the schools under review for this EIA and the potential receiving schools:

<i>School Closure or Consolidation Options Reviewed for EIA</i>	<i>Approximate Distance Between Schools</i>
1 Cooper Elementary to Highland Elementary	0.9 miles
2 Federal Terrace Elementary to Lincoln Elementary (Grades TK-3)	1.5 miles
2a Federal Terrace Elementary to Cooper Elementary (Grades 4-6)	1.6 miles
2b Federal Terrace Elementary to Highland Elementary (Grades 4-6)	2.0 miles
3a Finney Education Complex to Jesse Bethel High	2.2 miles
3b Finney Education Complex to Vallejo High	0.1 miles
4a Highland Elementary to Cooper Elementary	0.9 miles
4b Highland Elementary to Cooper Elementary and Federal Terrace Elementary	0.9-2.0 miles
4c Highland Elementary to Cooper Elementary and Lincoln Elementary	0.9-1.3 miles
5a Lincoln Elementary to Cooper Elementary	1.7 miles
5b Lincoln Elementary to Federal Terrace Elementary	1.5 miles
5c Lincoln Elementary to Highland Elementary	1.3 miles
6 Pennycook Elementary to Steffan Manor Elementary	0.7 miles
7a Steffan Manor Elementary to Pennycook Elementary	0.7 miles
7b Steffan Manor Elementary to Pennycook Elementary and Highland Elementary	0.7-1.0 miles
8a Federal Terrace Elementary and Lincoln Elementary to Cooper Elementary	1.6-1.7 miles
8b Federal Terrace Elementary and Lincoln Elementary to Highland Elementary	1.3-2.0 miles
Notes: distances are estimated direct straight-line distances (as the crow flies) between schools per Google Maps.	

To provide an assessment of the transportation impacts that may occur with each option under consideration for closure or consolidation, the number of students that may require transportation services is analyzed based on the minimum distance guidelines as described in Board policy.¹⁰

Option 1: Cooper Elementary to Highland Elementary

The map below identifies where the students live that attend Cooper Elementary (TK-5). In addition, the map identifies a one and one-half (1.5) mile radius around the receiving school, Highland Elementary.

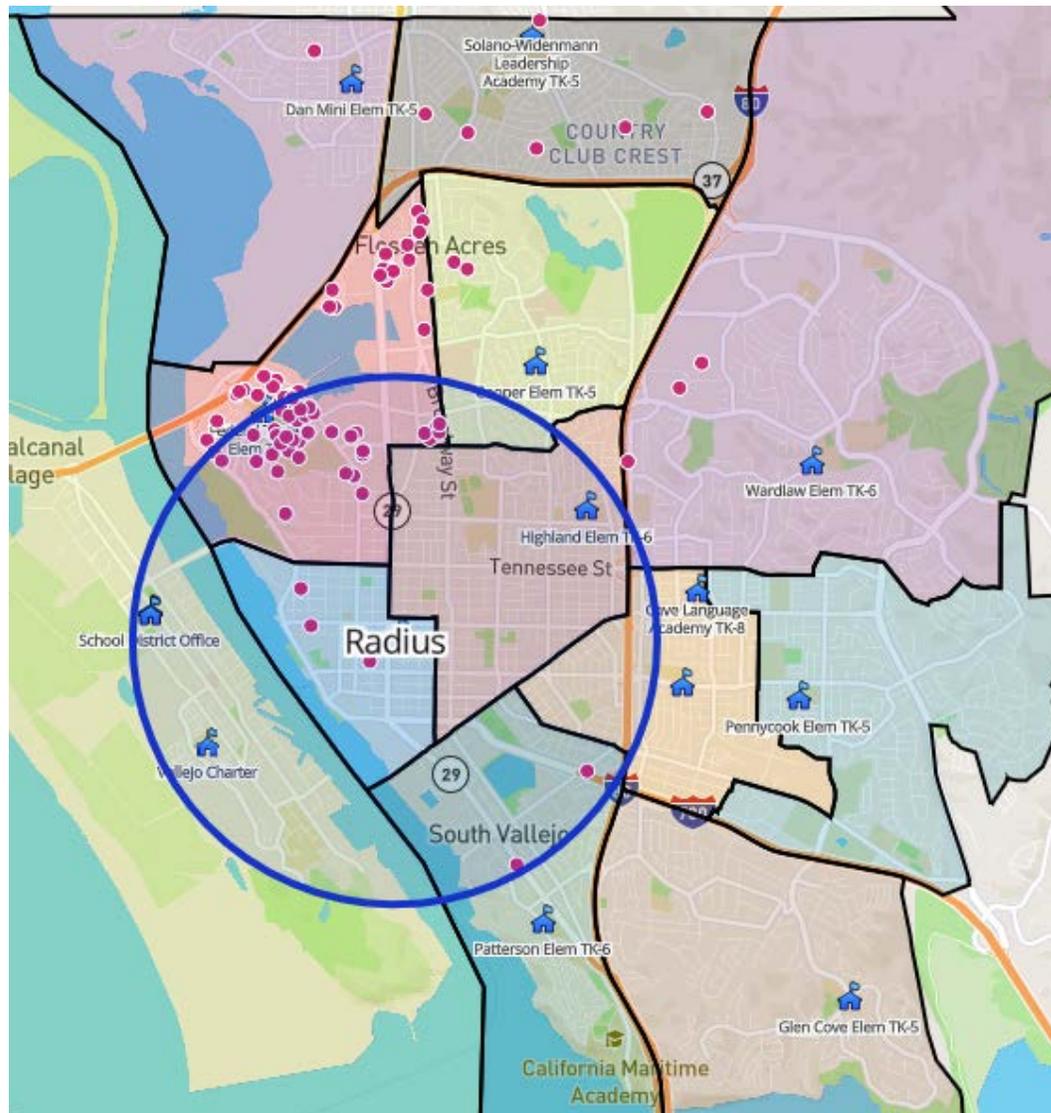


¹⁰ Estimates are based on student enrollment in FY 2024-25.

It is estimated that two hundred twenty-five (225) students attend Cooper Elementary and live within the one and one-half (1.5) mile radius of Highland Elementary. Outside of this radius and excluding students that live in other school attendance boundaries (not Cooper Elementary), it is estimated that seventy (70) students may require transportation services under current Board policies.

Option 2: Federal Terrace Elementary to Lincoln Elementary (Grades TK-3)

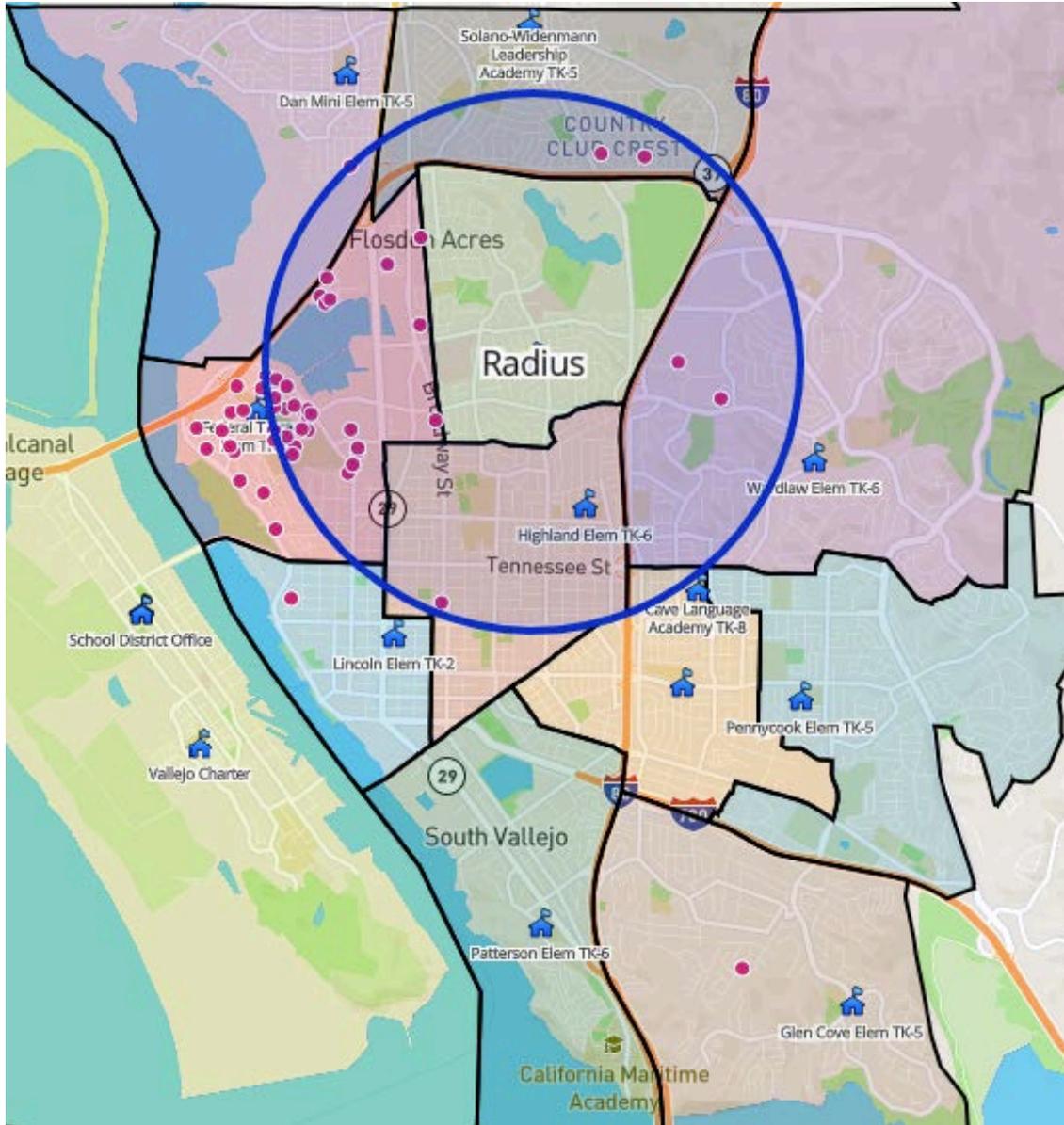
The map below identifies where the students live that attend Federal Terrace Elementary in grades TK-3. In addition, the map identifies a one and one-half (1.5) mile radius around the receiving school, Lincoln Elementary.



It is estimated that seventy-seven (77) students in grades TK-3 attend Federal Terrace Elementary and live within the one and one-half (1.5) mile radius of Lincoln Elementary. Outside of this radius and excluding students that live in other school attendance boundaries (not Federal Terrace Elementary), it is estimated that forty-one (41) students may require transportation services under current Board policies.

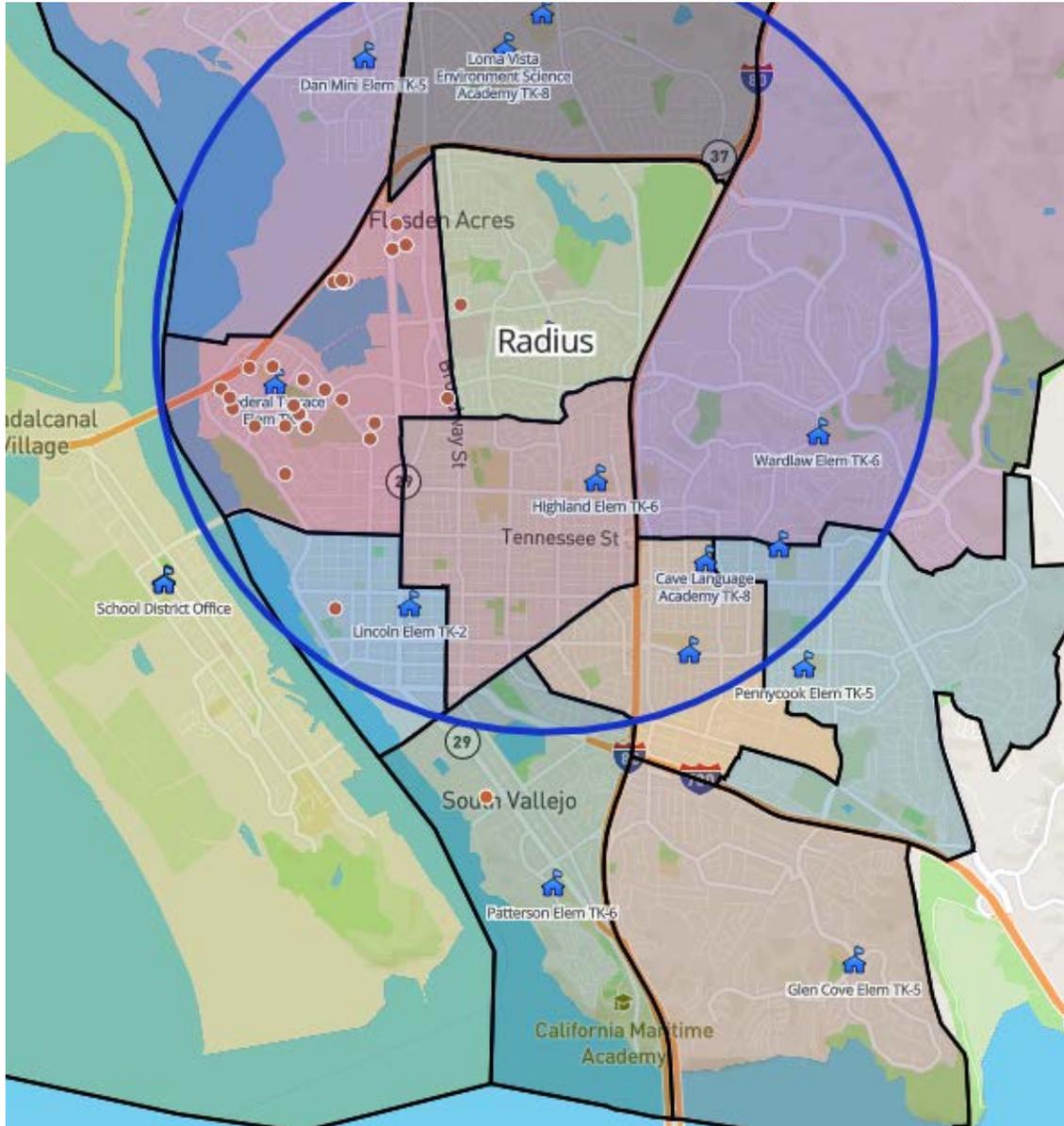
Option 2a: Federal Terrace Elementary to Cooper Elementary (Grades 4-6)

The map below identifies where the students live that attend Federal Terrace Elementary in grades 4-5. In addition, the map identifies a one and one-half (1.5) mile radius around the receiving school, Cooper Elementary.



It is estimated that forty (40) students in grades 4-5 attend Federal Terrace Elementary and live within the one and one-half (1.5) mile radius of Cooper Elementary. Outside of this radius and excluding students that live in other school attendance boundaries (not Federal Terrace Elementary), it is estimated that eighteen (18) students may require transportation services under current Board policies.

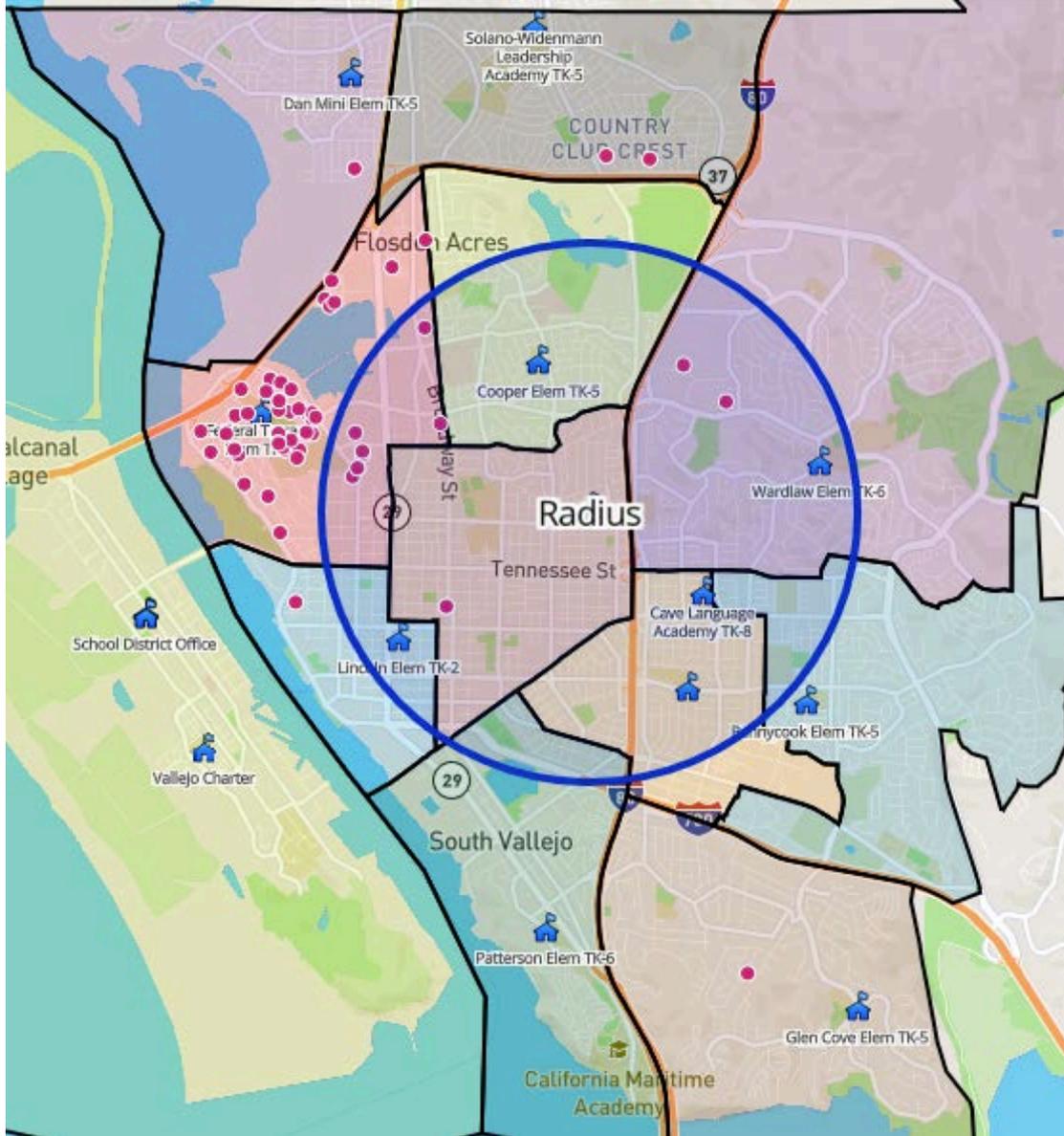
The map below identifies where the students live that attend Federal Terrace Elementary in grade 6. In addition, the map identifies a two and one-quarter (2.25) miles radius around the receiving school, Cooper Elementary.



It is estimated that thirty-one (31) students in grade 6 attend Federal Terrace Elementary and live within the two and one-quarter (2.25) mile radius of Cooper Elementary. Outside of this radius and excluding students that live in other school attendance boundaries (not Federal Terrace Elementary), it is estimated that no grade 6 students may require transportation services.

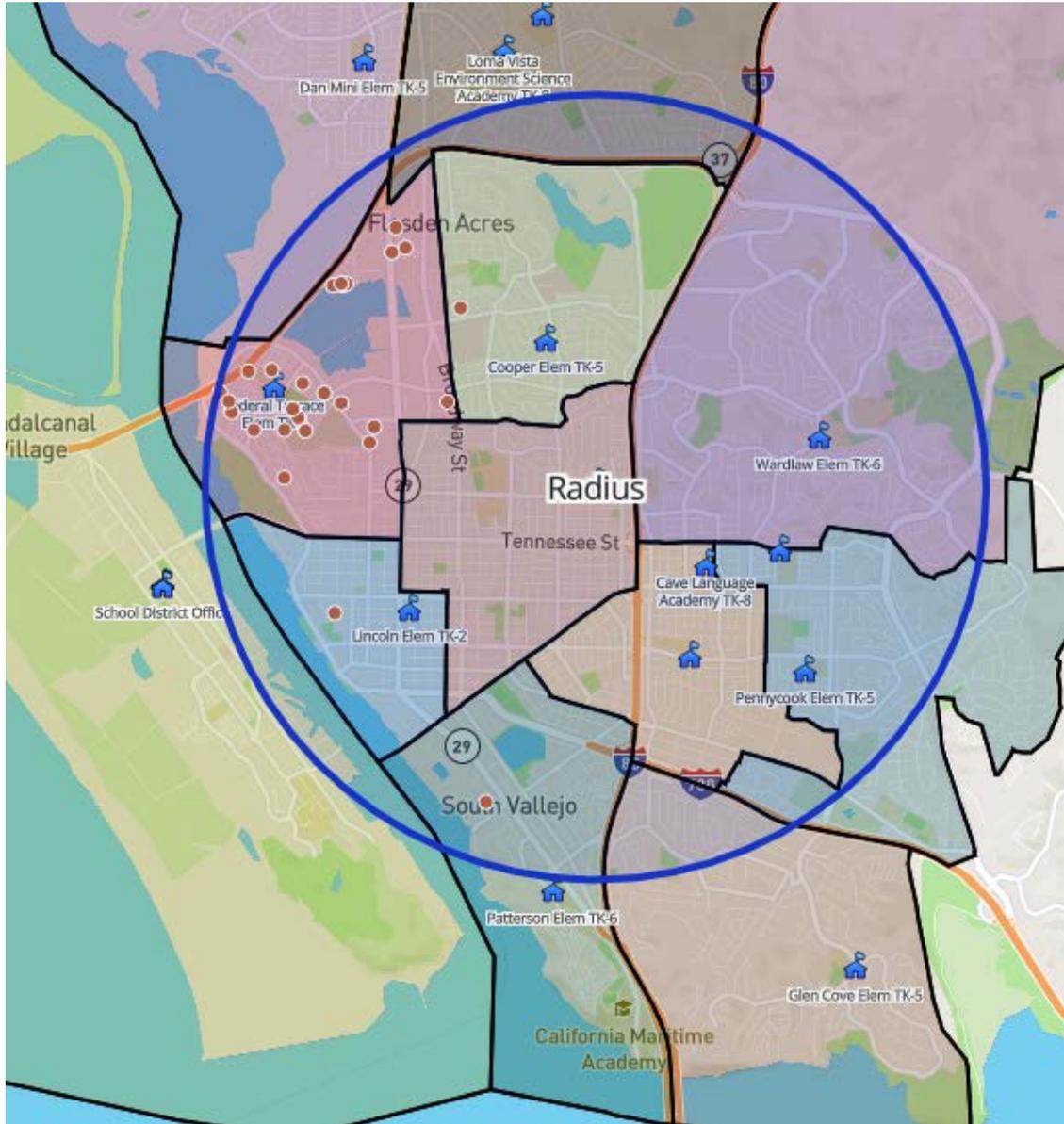
Option 2b: Federal Terrace Elementary to Highland Elementary (Grades 3-6)

The map below identifies where the students live that attend Federal Terrace Elementary in grades 4-5. In addition, the map identifies a one and one-half (1.5) mile radius around the receiving school, Highland Elementary.



It is estimated that thirteen (13) students in grades 4-5 attend Federal Terrace Elementary and live within the one and one-half (1.5) mile radius of Highland Elementary. Outside of this radius and excluding students that live in other school attendance boundaries (not Federal Terrace Elementary), it is estimated that forty-three (43) students may require transportation services.

The map below identifies where the students live that attend Federal Terrace Elementary in grade 6. In addition, the map identifies a two and one-quarter (2.25) mile radius around the receiving school, Highland Elementary.



It is estimated that thirty-two (32) students in grade 6 attend Federal Terrace Elementary and live within the two and one-quarter (2.25) mile radius of Highland Elementary. Outside of this radius and excluding students that live in other school attendance boundaries (not Federal Terrace Elementary), it is estimated that no grade 6 students may require transportation services.

Option 3a: John Finney High to Jesse Bethel High

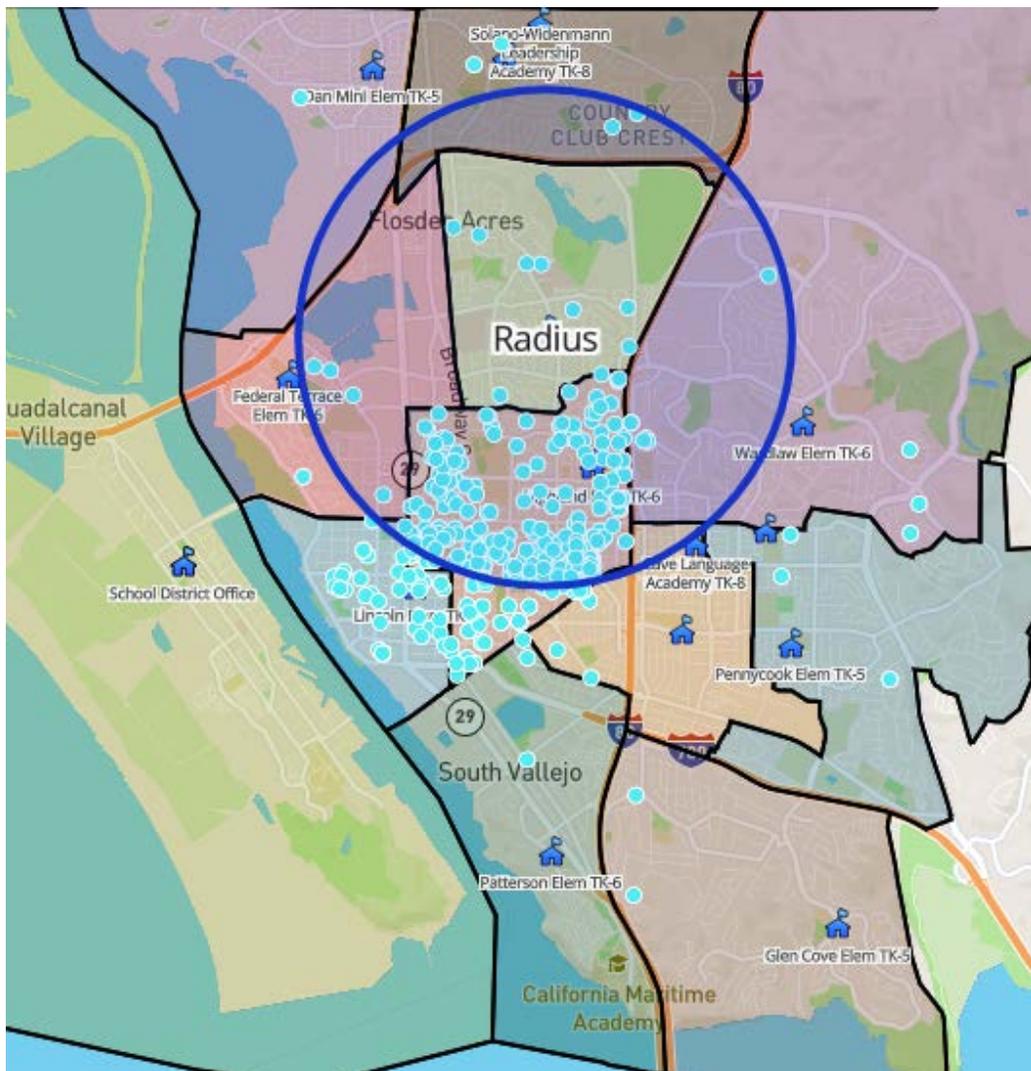
Board policy does not require transportation for high school students.

Option 3b: John Finney High to Vallejo High

Board policy does not require transportation for high school students.

Option 4a: Highland Elementary to Cooper Elementary

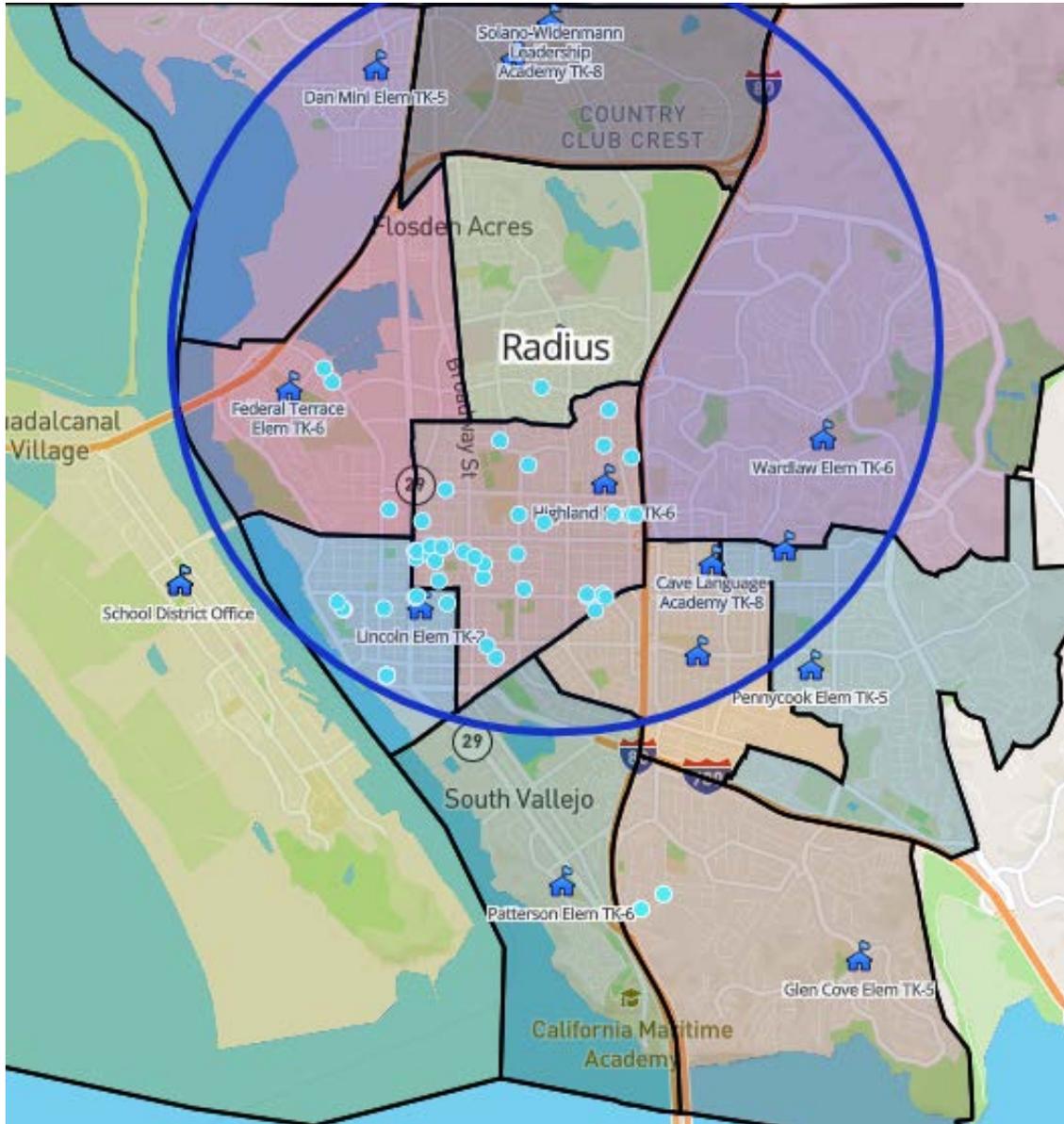
The map below identifies where the students in grades TK-5 live that attend Highland Elementary. In addition, the map identifies a one and one-half (1.5) mile radius around the receiving school, Cooper Elementary.



It is estimated that three hundred eighteen (318) students in grades TK-5 attend Highland Elementary and live within the one and one-half (1.5) mile radius of Cooper Elementary. Outside

of this radius and excluding students that live in other school attendance boundaries (not Highland Elementary), it is estimated that fifty (50) students may require transportation services.

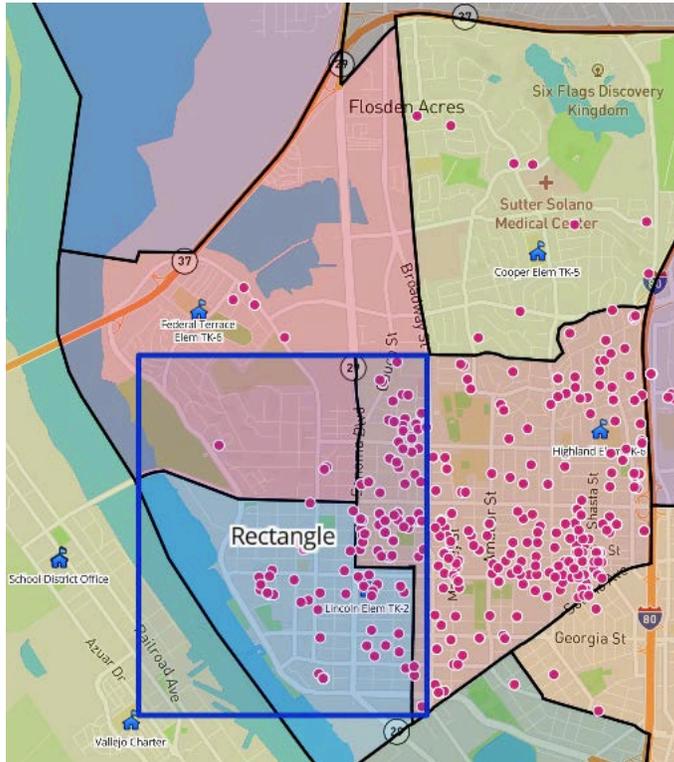
The map below identifies where the students in grade 6 live that attend Highland Elementary. In addition, the map identifies a two and one-quarter (2.25) mile radius around the receiving school, Cooper Elementary.



It is estimated that fifty-four (54) students in grade 6 attend Highland Elementary and live within the two and one-quarter (2.25) mile radius of Cooper Elementary. Outside of this radius and excluding students that live in other school attendance boundaries (not Highland Elementary), it is estimated that no grade 6 students may require transportation services.

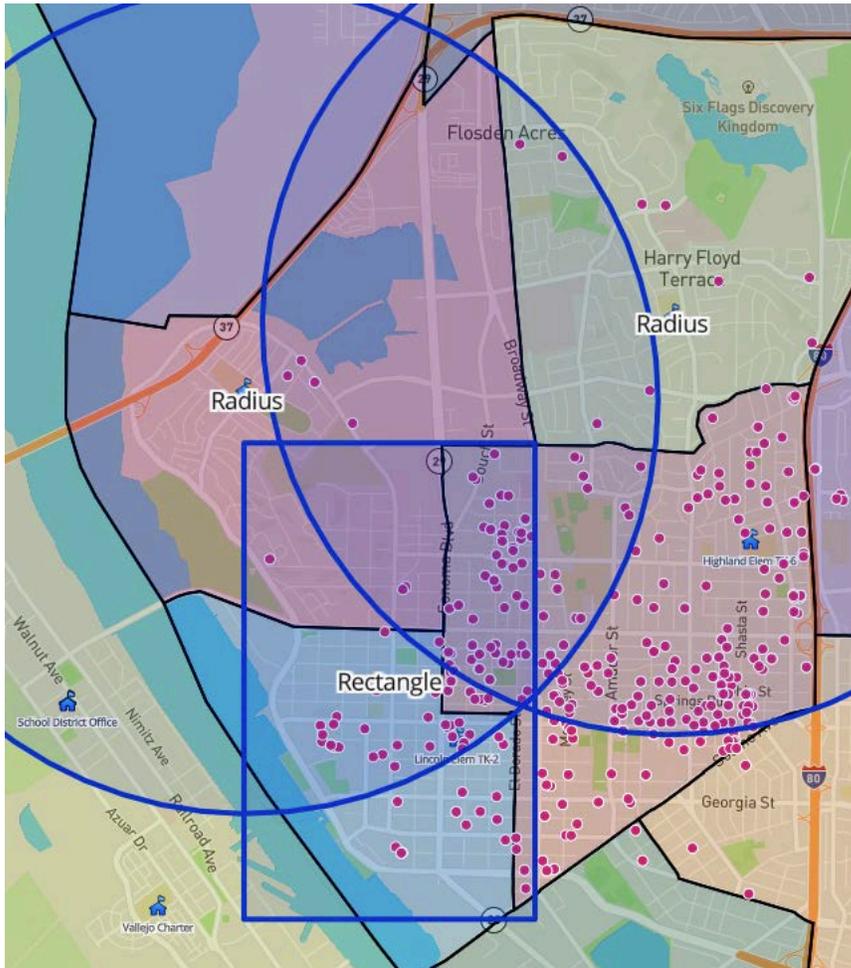
Option 4b: Highland Elementary to Cooper Elementary and Federal Terrace Elementary (split)

While the attendance boundaries may be adjusted as needed, for purposes of this analysis, it is assumed that the boundary is split along Broadway St, with students residing east to attend Cooper Elementary and students residing west to attend Federal Terrace Elementary. A map illustrating the boundary split is shown below, where the students within the rectangle who reside west of Broadway St would attend Federal Terrace Elementary.



The boundary split shown above results in 317 students from Highland Elementary attending Cooper Elementary and 183 students attending Federal Terrace Elementary.

The map below identifies a 1.50-mile radius around the receiving schools, Cooper Elementary and Federal Terrace Elementary, in relation to the boundary split.

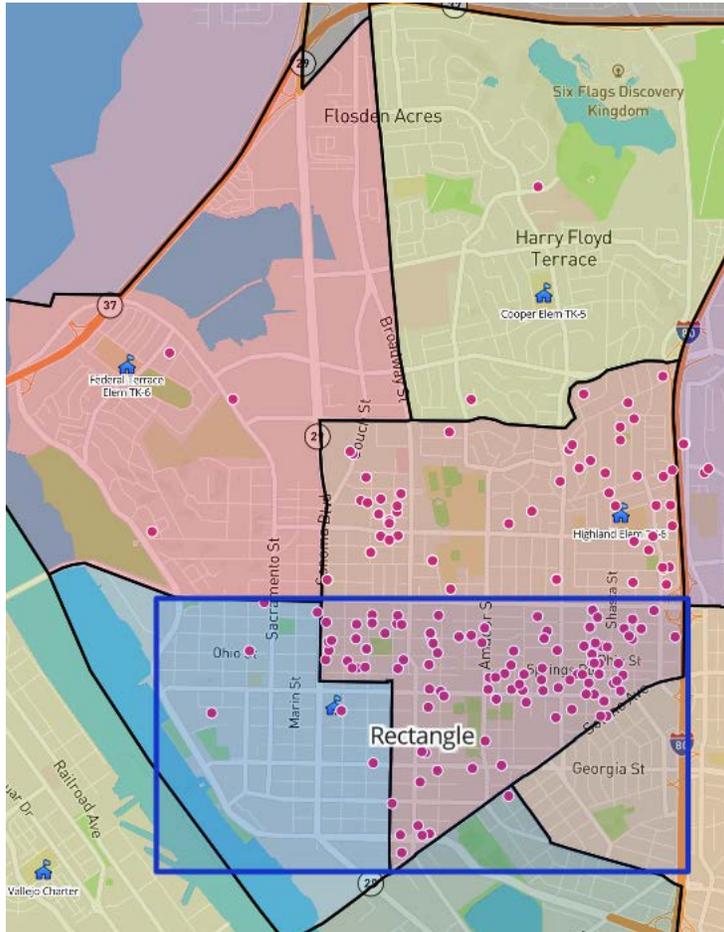


It is estimated that 357 students attend Highland Elementary in grades TK-5 and live within the 1.50-mile radius of Cooper Elementary and Federal Terrace Elementary. Outside of this radius and excluding students that live in other school attendance boundaries (not Highland Elementary), it is estimated that 45 students may require transportation services to Cooper Elementary.

In addition, it is estimated that 54 students in grade 6 attend Highland Elementary and live within the 2.25-mile radius of Cooper Elementary and Federal Terrace Elementary. Outside of this radius and excluding students that live in other school attendance boundaries (not Highland Elementary), it is estimated that no 6th grade students may require transportation services.

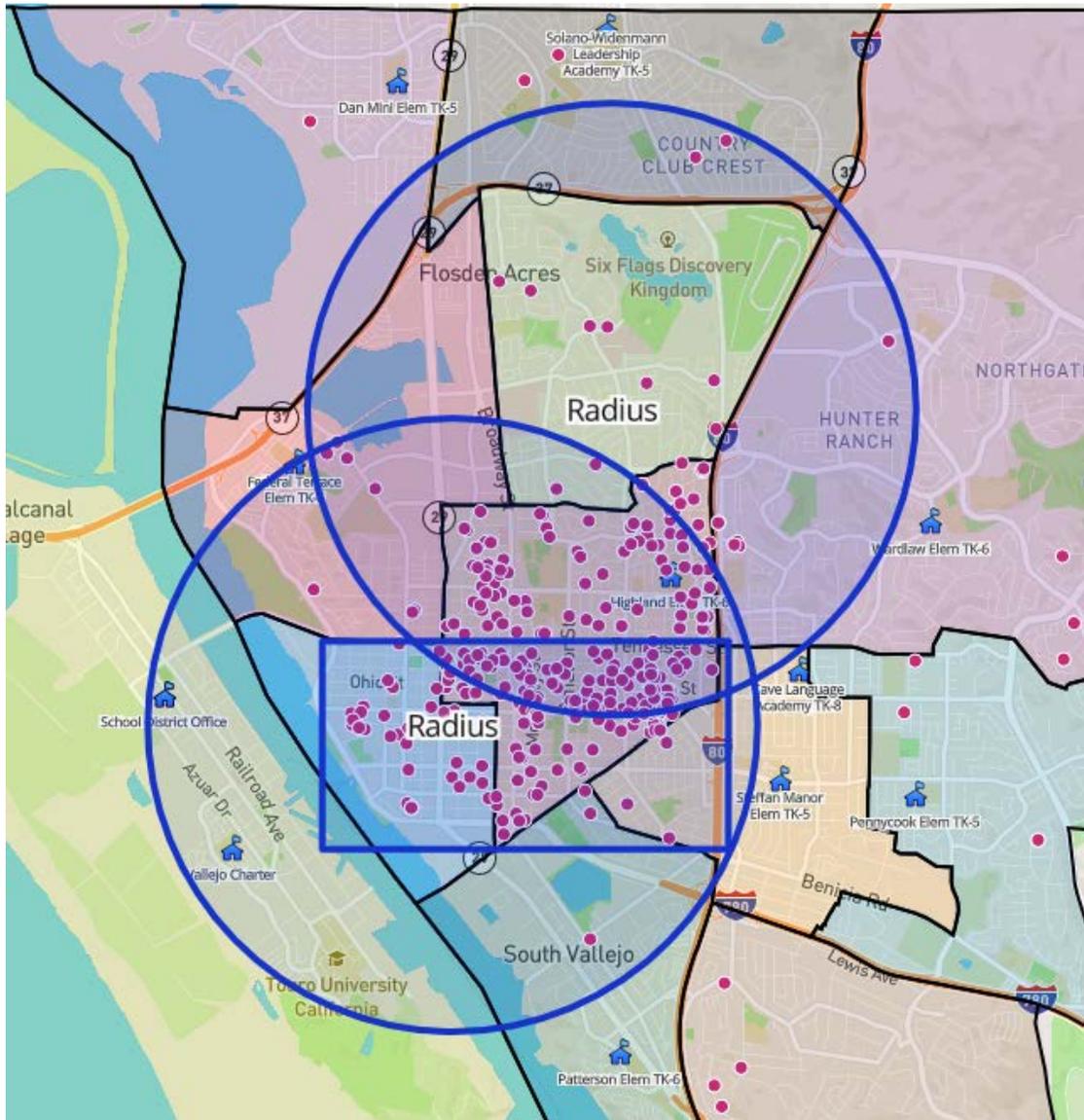
Option 4c: Highland Elementary to Cooper Elementary and Lincoln Elementary (split)

While the attendance boundaries may be adjusted as needed, for purposes of this analysis, it is assumed that the boundary is split along Tennessee St, with students residing north to attend Cooper Elementary and students residing south to attend Lincoln Elementary. A map illustrating the boundary split is shown below, where the students within the rectangle who reside south of Tennessee St would attend Lincoln Elementary



The boundary split shown above results in 117 students in grades TK-3 plus 204 students in grades 4-6 (for a total of 322 students in grades TK-6) to Cooper Elementary, and 180 students in grades TK-3 to attend Lincoln Elementary).

The map below identifies a 1.50-mile radius around the receiving schools, Cooper Elementary and Lincoln Elementary, in relation to the boundary split.

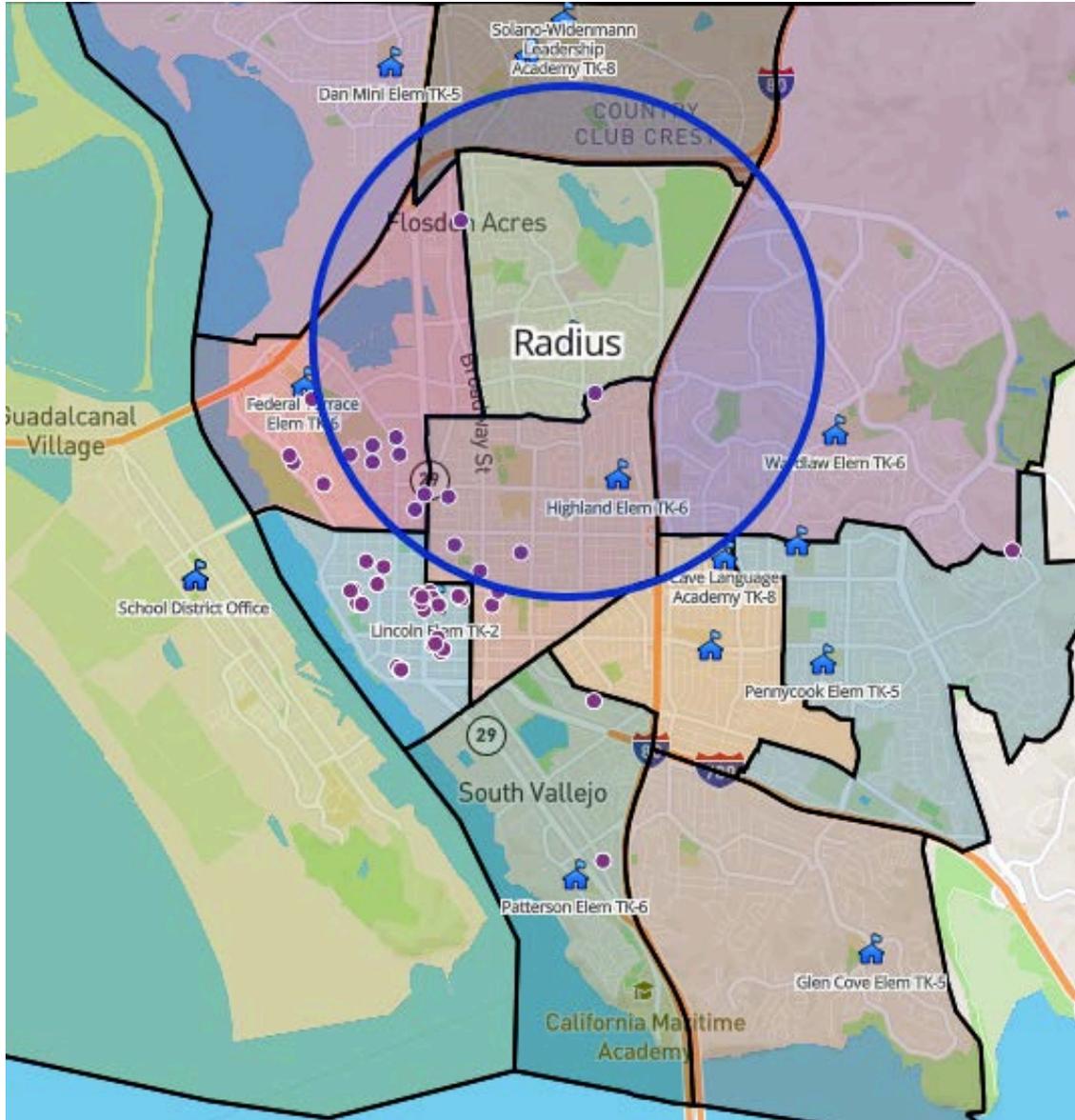


It is estimated that 432 students attend Highland Elementary in grades TK-5 and live within the 1.50-mile radius of Cooper Elementary and Lincoln Elementary. Outside of this radius and excluding students that live in other school attendance boundaries (not Highland Elementary), it is estimated that no TK-5 students may require transportation services.

In addition, it is estimated that 54 students in grade 6 attend Highland Elementary and live within the 2.25-mile radius of Cooper Elementary and Lincoln Elementary. Outside of this radius and excluding students that live in other school attendance boundaries (not Highland Elementary), it is estimated that no 6th grade students may require transportation services.

Option 5a: Lincoln Elementary to Cooper Elementary

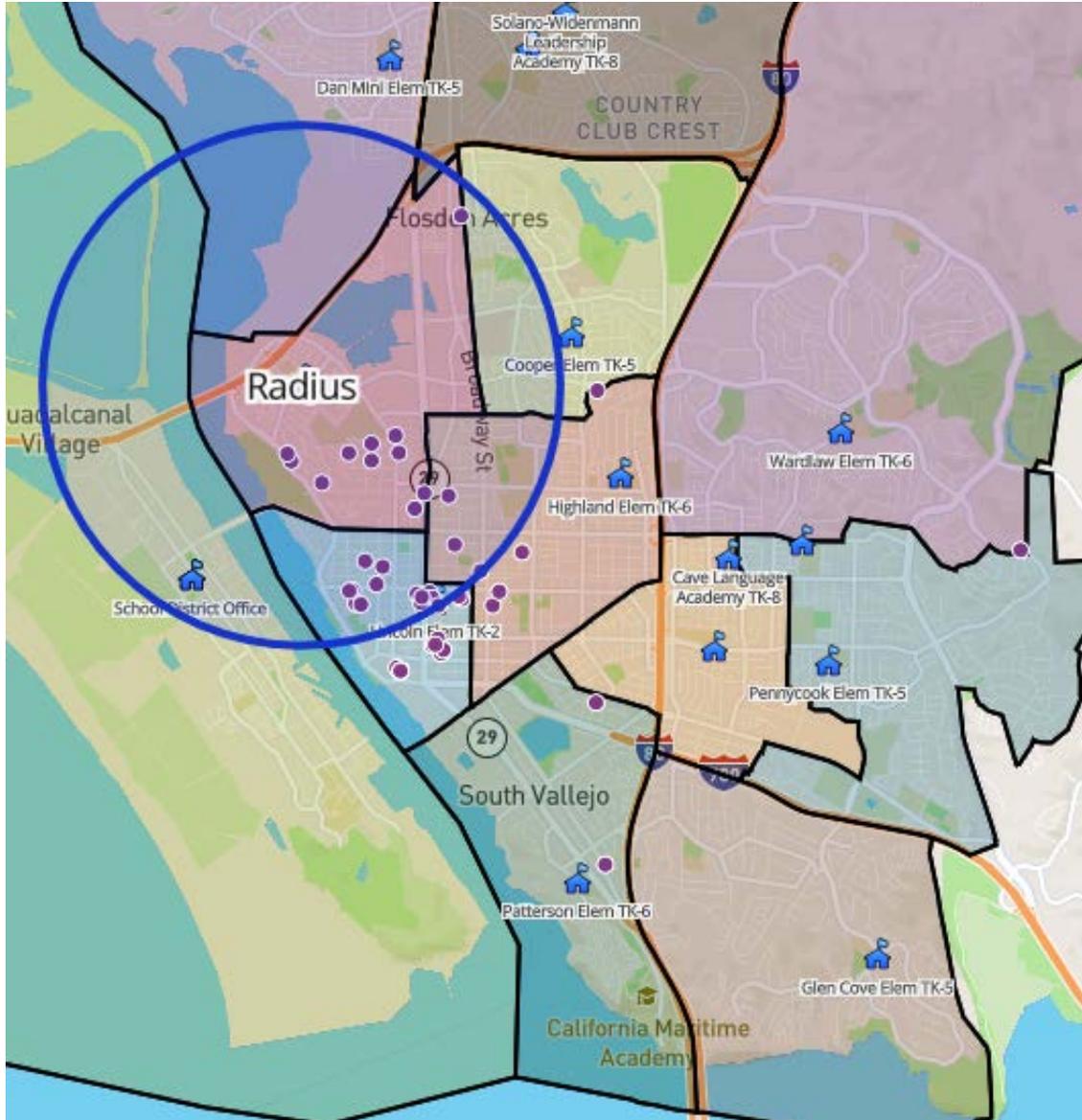
The map below identifies where the students live that attend Lincoln Elementary. In addition, the map identifies a one and one-half (1.5) mile radius around the receiving school, Cooper Elementary.



It is estimated that thirteen (13) students attend Lincoln Elementary and live within the one and one-half (1.5) mile radius of Cooper Elementary. Outside of this radius and excluding students that live in other school attendance boundaries (not Lincoln Elementary), it is estimated that forty-six (46) students may require transportation services.

Option 5b: Lincoln Elementary to Federal Terrace Elementary

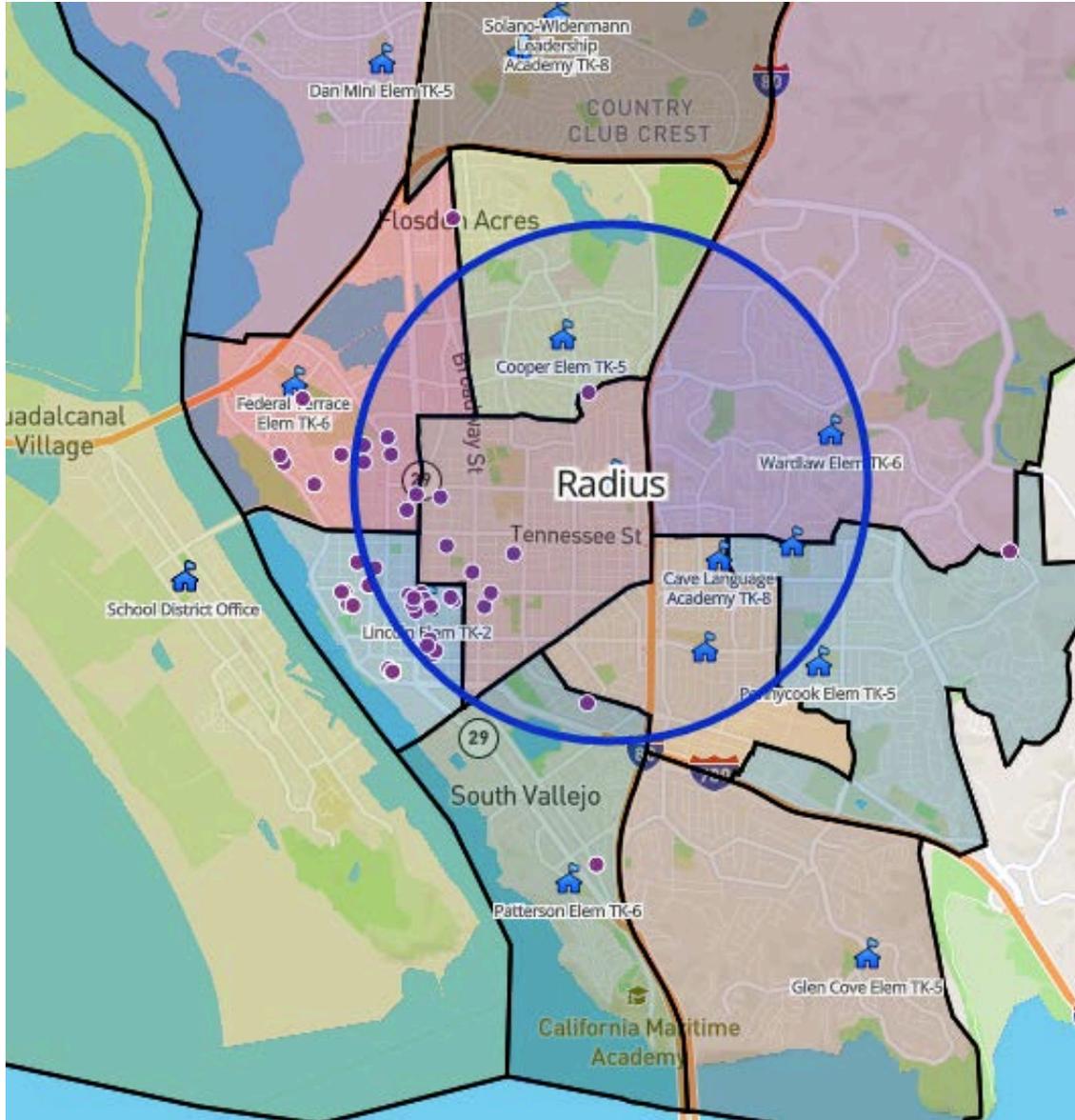
The map below identifies where the students live that attend Lincoln Elementary. In addition, the map identifies a one and one-half (1.5) mile radius around the receiving school, Federal Terrace Elementary.



It is estimated that thirty-six (36) students attend Lincoln Elementary and live within the one and one-half (1.5) mile radius of Federal Terrace Elementary. Outside of this radius and excluding students that live in other school attendance boundaries (not Lincoln Elementary), it is estimated that twenty-four (24) students may require transportation services.

Option 5c: Lincoln Elementary to Highland Elementary

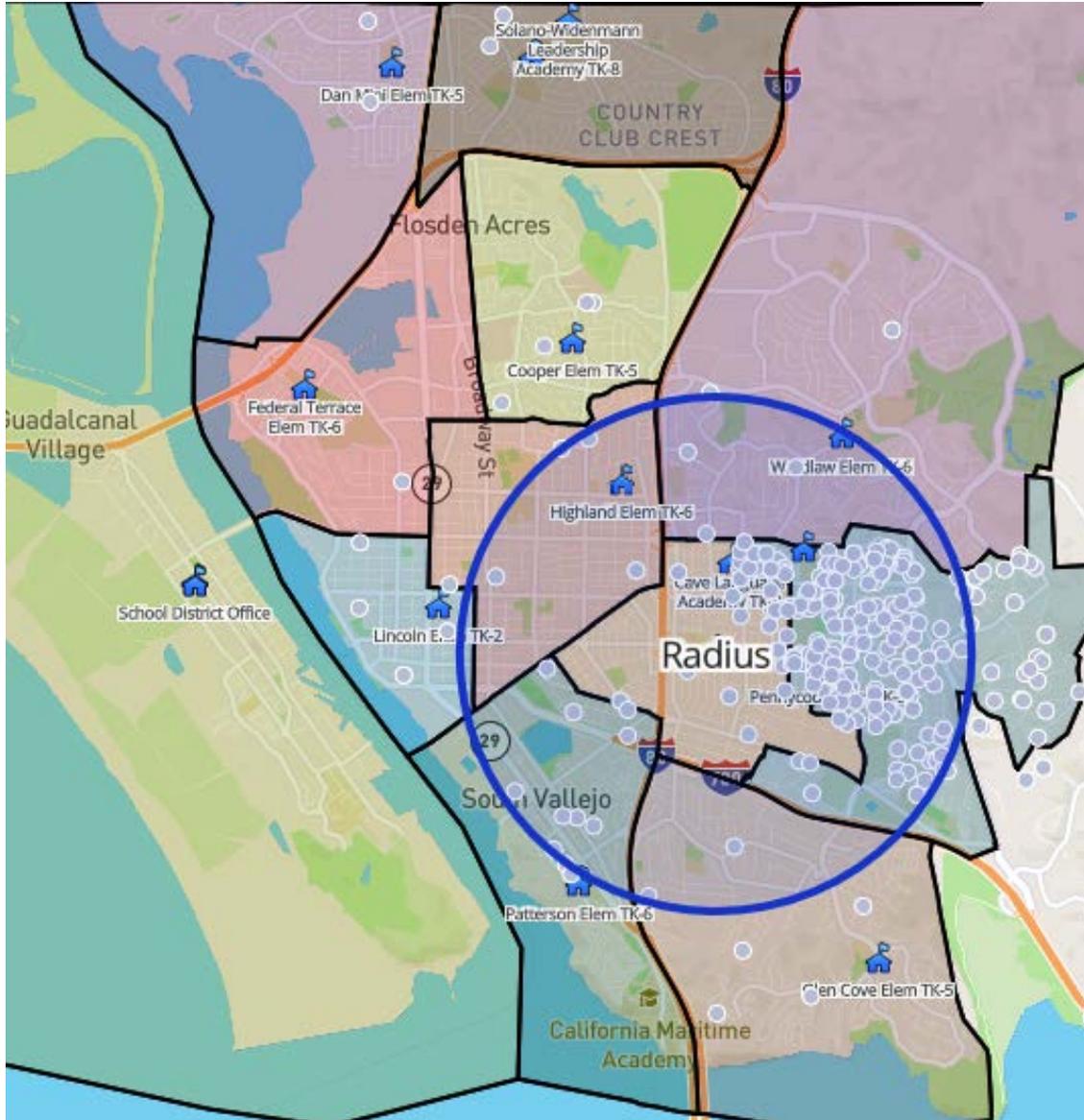
The map below identifies where the students live that attend Lincoln Elementary. In addition, the map identifies a one and one-half (1.5) mile radius around the receiving school, Highland Elementary.



It is estimated that thirty-five (35) students attend Lincoln Elementary and live within the one and one-half (1.5) mile radius of Highland Elementary. Outside of this radius and excluding students that live in other school attendance boundaries (not Lincoln Elementary), it is estimated that twenty-five (25) students may require transportation services.

Option 6: Pennycook Elementary to Steffan Manor Elementary

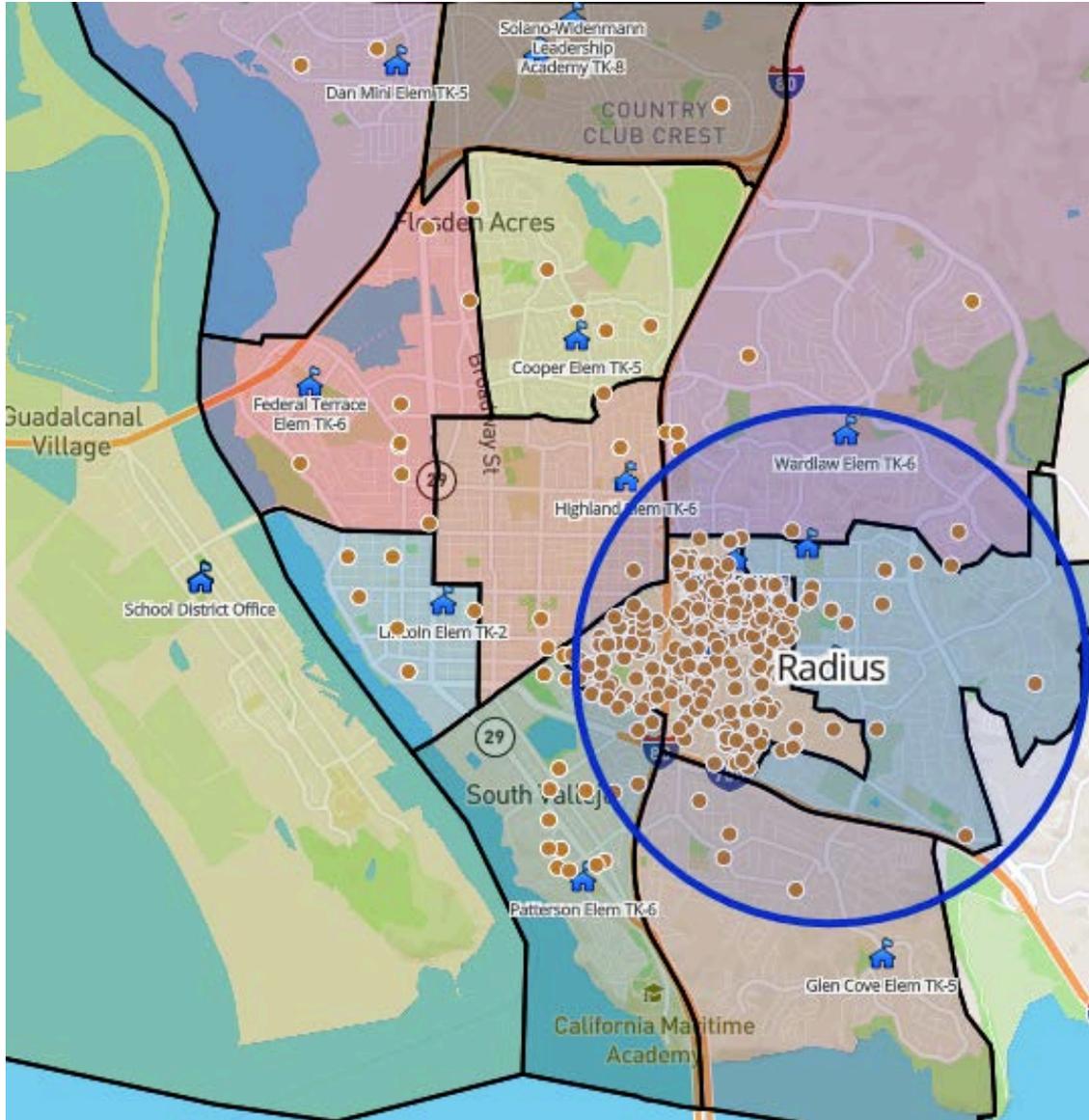
The map below identifies where the students live that attend Pennycook Elementary (TK-5). In addition, the map identifies a one and one-half (1.5) mile radius around the receiving school, Steffan Manor Elementary.



It is estimated that three hundred and three (303) students attend Pennycook Elementary and live within the one and one-half (1.5) mile radius of Steffan Manor Elementary. Outside of this radius and excluding students that live in other school attendance boundaries (not Pennycook Elementary), it is estimated that forty-two (42) students may require transportation services.

Option 7a: Steffan Manor Elementary to Pennycook Elementary

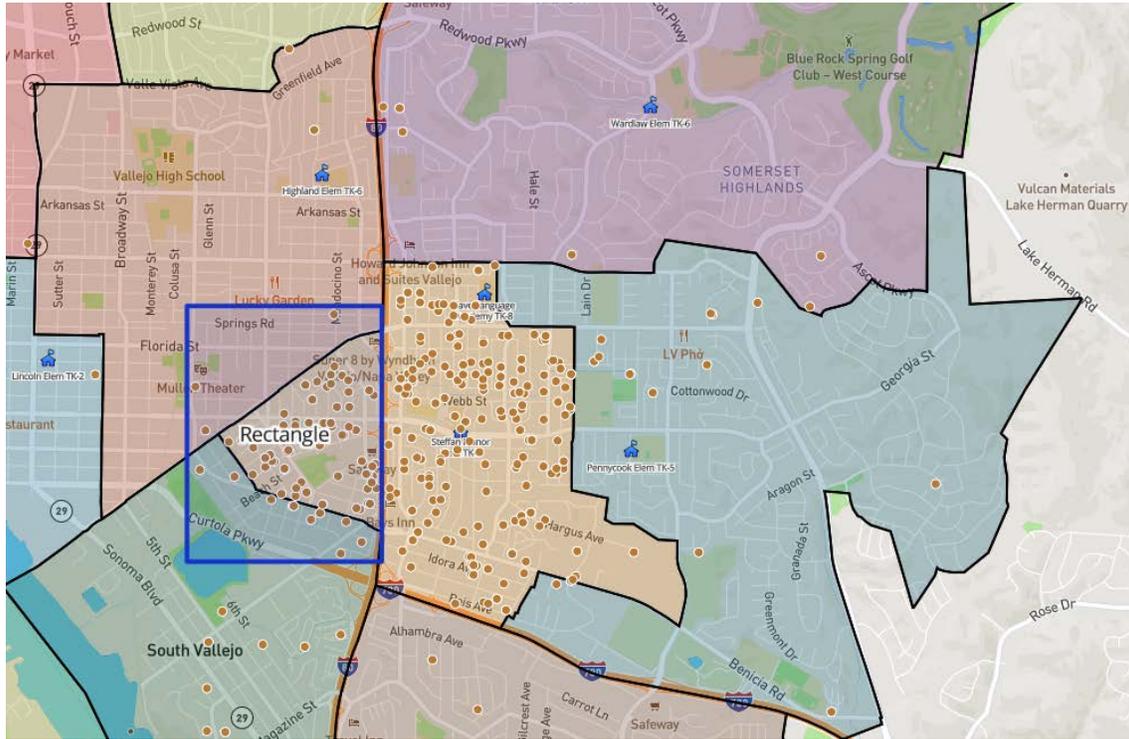
The map below identifies where the students live that attend Steffan Manor Elementary (TK-5). In addition, the map identifies a one and one-half (1.5) mile radius around the receiving school, Pennycook Elementary.



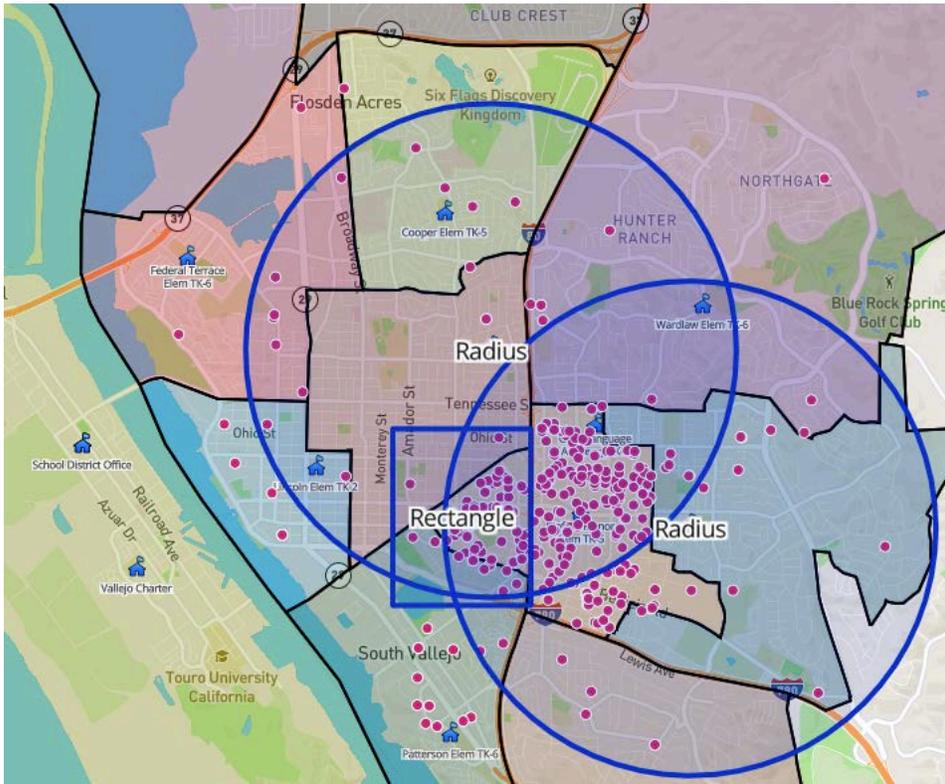
It is estimated that three hundred seventy-eight (378) students attend Steffan Manor Elementary and live within the one and one-half (1.5) mile radius of Pennycook Elementary. Outside of this radius and excluding students that live in other school attendance boundaries (not Steffan Manor Elementary), it is estimated that two (2) students may require transportation services.

Option 7b: Steffan Manor Elementary to Pennycook Elementary and Highland Elementary (split)

While the attendance boundaries may be adjusted as needed, for purposes of this analysis, it is assumed that the boundary is split along Highway 80, with students residing east to attend Pennycook Elementary and students residing west to attend Highland Elementary. A map illustrating the boundary split is shown below, where the students within the rectangle who reside west of Highway 80 would attend Highland Elementary.



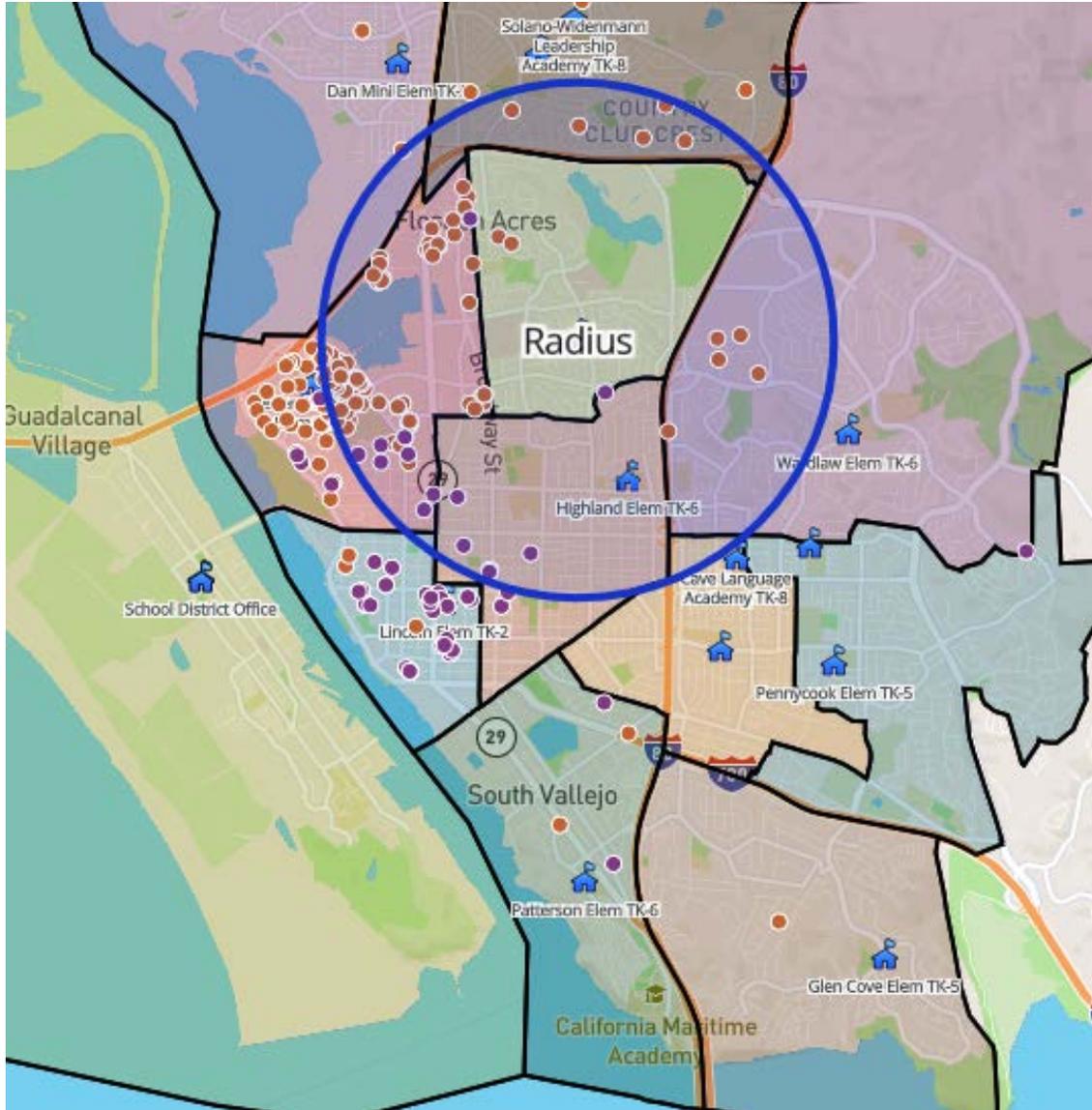
The map below identifies a 1.50-mile radius around the receiving schools, Pennycook Elementary and Highland Elementary, in relation to the boundary split.



It is estimated that 404 students who attend Steffan Manor Elementary live within the 1.50-mile radius of Pennycook Elementary and Highland Elementary. Outside of this radius and excluding students that live in other school attendance boundaries (not Steffan Manor Elementary), it is estimated that no students may require transportation services.

Option 8a: Lincoln Elementary and Federal Terrace Elementary to Cooper Elementary

The map below identifies where the students in grades TK-5 live that attend Lincoln Elementary and Federal Terrace Elementary. In addition, the map identifies a one and one-half (1.5) mile radius around the receiving school, Cooper Elementary.

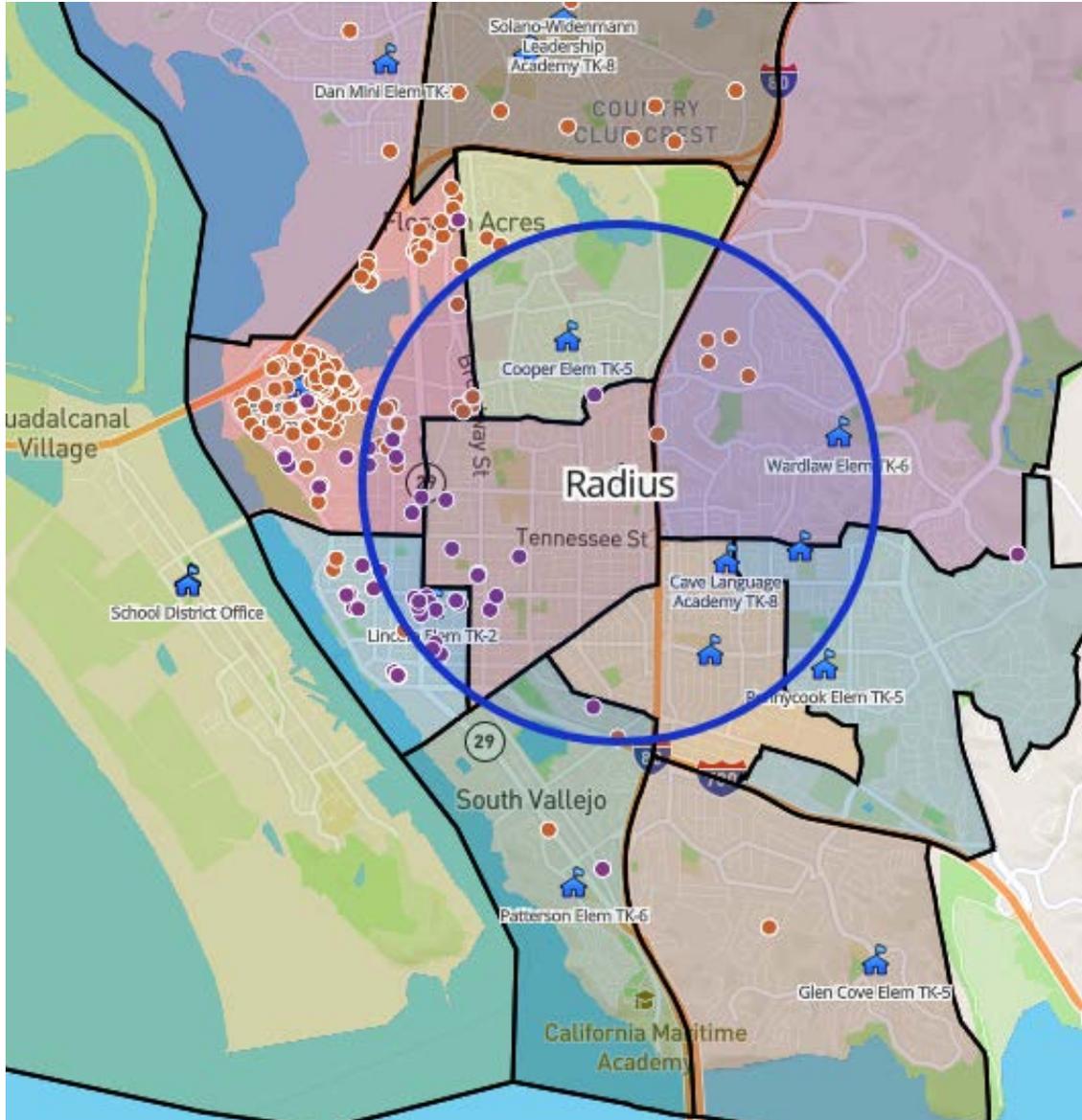


It is estimated that one hundred forty (140) students in grades TK-5 attend Lincoln Elementary and Federal Terrace Elementary and live within the one and one-half (1.5) mile radius of Cooper Elementary. Outside of this radius and excluding students that live in other school attendance boundaries (not Lincoln Elementary or Federal Terrace Elementary), it is estimated that one hundred eighteen (118) students may require transportation services.

As described previously, it is estimated that no grade 6 students from Federal Terrace Elementary may require transportation services to Cooper Elementary.

Option 8b: Lincoln Elementary and Federal Terrace Elementary to Highland Elementary

The map below identifies where the students in grades TK-5 live that attend Lincoln Elementary and Federal Terrace Elementary. In addition, the map identifies a one and one-half (1.5) mile radius around the receiving school, Highland Elementary.



It is estimated that seventy-seven (77) students in grades TK-5 attend Lincoln Elementary and Federal Terrace Elementary and live within the one and one-half (1.5) mile radius of Highland Elementary. Outside of this radius and excluding students that live in other school attendance boundaries (not Lincoln Elementary or Federal Terrace Elementary), it is estimated that one hundred sixty-seven (167) students may require transportation services.

As described previously, it is estimated that no grade 6 students from Federal Terrace Elementary may require transportation services to Highland Elementary.

Below is a table summarizing the estimates of students that may require additional transportation services.

<i>Legend of the Estimated Impact of Considerations Identified</i>			
Negligible	Low	Medium	High
<i>School Closure or Consolidation Options Reviewed for EIA</i>			
	<i>Distance</i>	<i>Estimate</i>	
3b	Finney Education Complex to Vallejo High*	0.1 miles	0
3a	Finney Education Complex to Jesse Bethel High*	2.2 miles	0
7b	Steffan Manor Elementary to Pennycook Elementary and Highland Elementary	0.7-1.0 miles	0
4c	Highland Elementary to Cooper Elementary and Lincoln Elementary	0.9-1.3 miles	0
7a	Steffan Manor Elementary to Pennycook Elementary	0.7 miles	2
5c	Lincoln Elementary to Highland Elementary*	1.3 miles	25
5b	Lincoln Elementary to Federal Terrace Elementary	1.5 miles	24
6	Pennycook Elementary to Steffan Manor Elementary	0.7 miles	42
5a	Lincoln Elementary to Cooper Elementary	1.7 miles	46
4a	Highland Elementary to Cooper Elementary	0.9 miles	50
4b	Highland Elementary to Cooper Elementary and Federal Terrace Elementary	0.9-2.0 miles	45
1	Cooper Elementary to Highland Elementary	0.9 miles	70
2	Federal Terrace Elementary to Lincoln Elementary (Grades TK-3)	1.5 miles	41
2a	Federal Terrace Elementary to Cooper Elementary (Grades 4-6)	1.6 miles	18
2b	Federal Terrace Elementary to Highland Elementary (Grades 4-6)	2.0 miles	43
8a	Federal Terrace Elementary and Lincoln Elementary to Cooper Elementary	1.6-1.7 miles	118
8b	Federal Terrace Elementary and Lincoln Elementary to Highland Elementary	1.3-2.0 miles	167

In the above table, the assessment of impacts is based on a combination of factors including distance between schools, the estimation of students that would require transportation services, and the number of transportation routes that may be involved. More specifically:

- Negligible impacts (in white) are based on the estimation that no students would require transportation services. John Finney High is ranked highest given that Board policy does not require transportation for high school students.
- Low impacts (in green) are based on the relatively few numbers of students (less than one class size) that may require transportation. Additionally, the community surrounding Lincoln Elementary is already provided transportation services to Highland Elementary for grades 4 – 6 so this is anticipated to be relatively low impact.
- Medium impacts (in yellow) are based on the estimation that a meaningful number of students (two to three class sizes) may require transportation.
- High impacts (in red) are based on the estimation that a high number of students may require transportation and that such transportation would be expected to involve multiple routes to different schools.

Options available to address transportation services include:

- Staggering school bell schedules
- Changing Board policy on minimum distance guidelines
- Adding more busses and bus drivers to the fleet

The potential increase in transportation services (and associated costs) that may be needed to accommodate the transportation impacts (such as bus stops, bus routes, number of busses and bus drivers, etc.) have not been estimated for purposes of this EIA. This is because the District has some options available that can reduce the need for transportation services, such as staggering school bell schedules or changing Board policy. Further, it is possible adding bus stops, and bus routes may be accommodated within the existing transportation capacity. Estimating the number of bus stops and bus routes involves considerations such as Board policy on minimum distance guidelines and path of travel concerns. Lastly, adding busses and bus drivers can be undertaken but is relatively expensive and can require a long timeframe to implement. The options to address transportation services will be subject to more detailed consideration on a case-by-case basis. However, by providing insight into the magnitude of the transportation needs that may be required, this EIA report provides a comparative analysis of the options under consideration.

(8) AESTHETICS

Aesthetics are reviewed to consider options and plans for the re-use of a school facility following closure to reduce the opportunity for blight and negative impacts.

Broad categories of options available for the re-use of a school facility are:

- Re-purpose the site for a different educational purpose
- Sell the site
- Lease the site
- Jointly develop and occupy the site with a private partner

Complicating matters are that the District's recent Measure S bond program was used to repair and improve most of the school sites under review by this EIA. As a result, the sites cannot be sold, leased, or jointly occupied with a private party without tax consequences associated with the tax-exempt bonds (which are limited to governmental purposes). While the District may still experience operational cost savings from closing or consolidating a school, there may be constraints on developing the site to its highest and best use. As such, there may be limitations on how much revenue might be generated from the vacant site.

The exception to the constraints associated with Measure S bond program is the John Finney Education Complex, where no bond funds have been spent. As a result, the District would have more flexibility in how to re-use the school facility if it were to be closed or consolidated, and so the site may be a candidate for sale or lease. Given adjacent land uses of residential, a possibility is that this property could potentially be developed into housing.

Lincoln Elementary is a noteworthy school site, given its location in downtown Vallejo approximately ½ mile from City Hall. Preliminary ideas for re-use of the site involve a community hub or wellness center to provide important services to community members related to education and health, potentially in partnership with the City of Vallejo.

The other five school sites (beyond the John Finney Education Complex and Lincoln Elementary) would involve further public input and community engagement to consider ideas for re-use.

Some of the closed school sites may be considered for occupancy by John Finney High following relocation.

With all school sites to be closed, the District appears committed to pursuing a re-use, whether for its own purposes to provide educational services, or for a sale, lease, or joint occupancy with a private partner.

(9) FEEDER SCHOOL ATTENDANCE PATTERNS

Feeder school attendance patterns are reviewed to assess the student demographics at feeder schools and whether closure would disproportionately impact any particular demographic group.

For middle school, Hogan Middle School serves grades 6-8 and is the only middle school in the District. Solano Widenmann Academy serves grades TK-8, and some optional schools without an attendance boundary (Cave Language Academy and Vallejo Charter School) also serve grades TK-8, but none of the TK-8 schools are under consideration for school closure or consolidation. As a result, it is not anticipated that any of the options under review for this EIA would meaningfully impact the attendance patterns at the middle school level. Therefore, changes to school attendance boundaries as a result of school closure or consolidation options under consideration are not expected to impact middle school attendance boundaries.

For high school, both Vallejo High School and Jesse Bethel High School serve grades 9-12. The attendance boundary is split down the Interstate 80 freeway, with Vallejo High School serving students west of the freeway and Jesse Bethel High School serving students east of the freeway. None of the options under review for this EIA cross the freeway. In other words, both the schools under consideration for school closure or consolidation and the associated receiving schools are located on the same side of the freeway. As a result, it is not anticipated that any of the options under review for this EIA would meaningfully impact the attendance patterns at the high school level. Therefore, changes to school attendance boundaries as a result of school closure or consolidation options under consideration are not expected to impact high school attendance boundaries.

While John Finney Education Complex also serves grades 9-12, this school site offers special programs as discussed in the Special Programs section of this report. Students attending John Finney High School are not expected to be integrated into classrooms and programs with other students attending Jesse Bethel High School or Vallejo High School. Rather, the school is expected to be relocated and operated as either its own school or as a “school within a school” framework. Therefore, the consolidation or relocation of this school is not expected to impact high school attendance boundaries.

(10) COMMUNITY ENGAGEMENT

The District undertook an extensive community engagement process in the consideration of equity impacts associated with school closures and consolidations. The community engagement process included the following:

- A draft of the EIA report was presented at a regular Board meeting on September 17, 2025
- Study sessions were held at a special Board meeting on September 24, 2025, and following the regular Board meeting on October 15, 2025
- Town Hall meetings were held on September 10, October 20, October 28, October 29, and November 18, 2025.
- Community members could submit questions online and both questions and answers were made available for reading on the District's website

Input was received from community members, Board members and student Board members. Below is a summary of the input received that impacts the set of metrics at the schools evaluated for potential closure or consolidation as discussed in the EIA:

Lincoln Elementary

EIA Metric of Aesthetics: the historical significance of Lincoln Elementary, dating back to 1857, along with its prominent downtown location increases the importance of beneficially repurposing the site to avoid blight.

EIA Metric of Demographics: the school site serves not just as a place of learning but also a community center providing food, clothing, and a safe space for higher need students.

Considerations for the school site, should it be closed, included the facility's potential to serve as a wellness center or a resource center, perhaps in partnership with the City of Vallejo and/or non-profit partners and/or local businesses.

Finney Education Complex

EIA Metric of Special Programs: the Finney Education complex houses special programs serving special education and higher need students. As such, it is important to ensure any relocation or consolidation includes providing a welcoming and accommodating environment that is equipped to serve such students.

EIA Metric of Facilities Condition: the school site currently lacks athletic and/or recreation space. Therefore, a benefit of relocating to another school site is that such site would provide students the option to take advantage of using athletic and/or recreation space.

Considerations for the school site, should it be closed, included the facility's potential to serve as a District office, a future middle school, and sale or lease to a third-party.

Highland Elementary School

EIA Metric of Facilities Condition: the school site has newer, more modern facilities in comparison to the nearby Cooper Elementary.

EIA Metric of Capacity: the facilities on site can house a relatively large student capacity; however, the parking capacity and the drop off / pick up capacity are relatively limited in comparison to Cooper Elementary.

Cooper Elementary School

EIA Metric of Facilities Condition: the school site has relatively aged facilities in comparison to the nearby Highland Elementary.

EIA Metric of Capacity: the facilities on site house a relatively small student capacity; however, the parking capacity and the drop off / pick up capacity are relatively more expansive in comparison to Highland Elementary.

Steffan Manor Elementary School

EIA Metric of Facilities Condition: the school site has newer, more modern facilities in comparison to the nearby Pennycook Elementary.

EIA Metric of Capacity: the facilities on site can house a relatively large student capacity, especially with the school's ability to accommodate many students in the multi-purpose room (MPR); however, the parking capacity and the drop off / pick up capacity are relatively limited in comparison to Pennycook Elementary.

Pennycook Elementary School

EIA Metric of Facilities Condition: the school site has relatively aged facilities in comparison to the nearby Steffan Manor Elementary.

EIA Metric of Capacity: the facilities on site house a relatively small student capacity, particularly with the school's small MPR where the site is already challenged with providing space for assemblies, lunches, events, and other student gatherings; however, the parking capacity and the drop off / pick up capacity are relatively more accommodating in comparison to Steffan Manor Elementary.

(11) CONCLUSION

A desired benefit of this EIA is to evaluate whether any option under consideration would have a discriminatory impact on a demographic group. For purposes of this report, rising to the level of discriminatory involves the following findings:

- Whether the school site was selected for closure or consolidation on the basis of a particular student group
- Whether the school site, if closed or consolidated, would have a discriminatory and disproportionate impact on a particular student group
- Whether the school site, if closed or consolidated, would lead to a discriminatory, disproportionate effect on the concentration of a particular student group at the receiving school

Many student groups were reviewed in this report, including students with higher needs and students based on a variety of demographics. An important conclusion is that, based on all the metrics reviewed in this EIA, none of the impacts that were identified in this report rose to the level of discriminatory against any particular student group.

A summary table of the estimated impacts is below:

Legend of the Estimated Impact of Considerations Identified									
Negligible	Low	Medium	High						
				Operating Cost	Environmental	Demographics	Aesthetics	Transportation	
6	Pennycook to Steffan Manor			Operating Cost	Environmental	Demographics	Aesthetics	Transportation	
4c	Highland to Cooper and Lincoln			Transportation					
5a	Lincoln to Cooper			Operating Cost	Environmental	Demographics	Aesthetics	Transportation	
1	Cooper to Highland			Environmental	Transportation				
4b	Highland to Cooper and Federal Terrace			Operating Cost	Environmental	Demographics	Transportation		
				Environmental	Transportation				
				Environmental	Transportation				
8a	Federal Terrace and Lincoln to Cooper			Operating Cost	Environmental	Demographics	Transportation	Aesthetics	
8b	Federal Terrace and Lincoln to Highland			Operating Cost	Environmental	Demographics	Transportation	Aesthetics	
4a	Highland to Cooper			Operating Cost	Capacity	Special Programs	Environmental	Demographics	Transportation

In the above table, the schools are ranked based on both the number of impacts as well as the estimated level of impact. The following conclusions can be drawn:

- Steffan Manor Elementary is anticipated to have negligible impacts (in white).
- Finney Education Complex and Lincoln Elementary (to either Highland Elementary or Federal Terrace Elementary) are anticipated to have low impacts (in green).
- Pennycook Elementary, Highland Elementary, Cooper Elementary and Lincoln Elementary (to Cooper Elementary) are all estimated to have medium impacts (in yellow).
- Federal Terrace Elementary and Highland Elementary (to Cooper Elementary) are both estimated to have high impacts. More specifically, the closure of consolidation of Federal Terrace Elementary is anticipated to create a significant burden on transportation, and the closure of Highland Elementary to Cooper Elementary faces difficult capacity challenges in accommodating both general education and special education students.

In conclusion, none of the above impacts appear to rise to the level of discriminatory such that they would prohibit the District from moving forward with the school closure or consolidation options. However, the impacts offer insight into useful considerations for how the options might be prioritized.