May 6, 2009

Jack O’Connell, State Superintendent of Public Instruction
California Department of Education
1430 N Street
Sacramento, CA 95814

Re: California Department of Education and Healthy School Siting Policies

Dear Superintendent O’Connell:

The Ad-Hoc Coalition for Healthy School Siting is pleased to offer to the California Department of Education (CDE) detailed recommendations for improving California’s school facility planning and design policies, found in Title 5, California Code of Regulations, School Site Selection and Approval Guide (Blue Book), and Guide to School Site Analysis and Development (Yellow Book) as a follow-up to our January 31, 2008 memo “Revising CDE School Siting Policy Documents” (attached). We appreciated the opportunity to discuss the letter with Kathleen Moore and Michael O’Neill at a March 14, 2008 meeting in Sacramento; this document represents the detailed policy recommendations that your staff requested.

Our recommendations fall into six categories (see indexed summary at end of document).

- **Encouraging Local Flexibility** – expand discussion on existing flexibility, explore successful examples where exemptions were granted, consider alternatives to minimum acreage recommendations.

- **Encouraging Safe Routes to School** – add site selection criteria and expand discussion to better address needs of pedestrians and bicyclists.

- **Deepening School-Community Relationships, Including Promoting Joint-Use** – help build collaboration with cities, counties and neighborhood groups by encouraging joint discussion and evaluation of resources, include case studies.

- **Tailoring School Siting Policies to Support California’s Climate Change Goals** – add a standard and discussion related to meeting the State’s goals.

- **Ensuring Efficient Use of Public Resources** – add a standard and provide tools and examples that help districts assess existing resources and utilize them.

- **Reorganizing and Updating CDE Policy Documents for Accuracy and Clarity** – update references to out-of-date documents, merge Blue and Yellow Books to improve clarity, give equal weight to all aspects of Title 5.

The Ad-Hoc Coalition for Healthy School Siting is a group of five California-based entities with a keen interest in supporting high quality schools and neighborhoods. Together, we have conducted detailed analysis of research and policies on school location and design, and their corresponding linkages to education quality, health, transportation, and community design.
We have found that the location of a school has a variety of important impacts on students, teachers, learning environments, and families, as well as neighborhoods. Our previous memo detailed research behind these connections, and 42 California-based organizations signed on in support of its policy recommendations. Key aspects of “healthy school siting” include school locations that are walkable, bicycle-friendly, and well integrated into communities and neighborhoods.

We fully support the need for the highest possible quality of educational programming in California and believe that healthy school siting can increase academic performance, save money, improve student health and safety, increase equity and opportunities for educational experiences, as well as help California to meet the climate change goals mandated by recent state legislation, AB 32 and SB 375.

We applaud CDE’s recent report, Healthy Children Ready to Learn, which helps lay the groundwork for school facility practices that do their part in promoting healthy students, schools, and communities in California. In the spirit of helping advance this goal, we present 36 school siting policy recommendations to CDE. In order to accomplish our vision of Healthy School Siting, a broad range of stakeholders must be involved, and to that end, we are also providing other agencies and local governments with recommendations. We acknowledge that successfully siting a school is no small task, but healthy school siting is achievable if we work collectively.

Thank you for your consideration of the attached recommendations. We would like to request a follow-up meeting with School Facilities Planning Division staff to discuss and a written response. We will be contacting staff to schedule a meeting soon. Feel free to contact Scott Clark at (916) 448-1198 x320 or sclark@lgc.org to discuss any aspect.

Sincerely,
Ad Hoc Coalition for Healthy School Siting
Scott Clark, MPA - Project Manager, Local Government Commission
Jeffrey M. Vincent, PhD, Deputy Director, UC Berkeley’s Center for Cities & Schools
Deb Hubsmith, Director Safe Routes to School National Partnership
Manal Aboelata, MPH, Program Director, Prevention Institute
Connie Busse, Executive Director, Cities Counties and Schools Partnership

cc: William Ellerbee, Deputy Superintendent, School & District Operations Branch, CDE
Kathleen Moore, Director, School Facilities Planning Division, CDE
Lori Morgan, Deputy Executive Officer, Office of Public School Construction
David Thorman, State Architect of California, Division of the State Architect
Tom Neumann, Chief, Office of Community Planning, Department of Transportation
Jacquolyn Duerr, Acting Chief, Epidemiology and Prevention for Injury Control Branch, California Department of Public Health
Kurt Karperos, Chief, Air Quality & Transportation Planning Branch, California Air Resources Board
Title 5, California Code of Regulations

§14001. Minimum Standards

Recommendation 1: Add a standard related to meeting California’s climate change goals.

California recently took bold steps to combat climate change by legislating the reduction of greenhouse gas emissions to 1990 levels by 2020 (Assembly Bill 32) and enacting legislation that requires coordination of regional transportation and land use plans to meet climate emission reduction targets (Senate Bill 375). Both policy directives enact fundamental changes to land use and transportation planning throughout California. We are aware that related discussions have been held at CDE on energy efficiency and resource conservation through the Collaborative for High Performance Schools, but a key element of sustainability - school site location - has yet to be fully explored. School districts play an important role in local land use decisions, and as such, school siting choices must be aligned with these broader state policy changes related to climate mandates. In setting state school siting policy, CDE plays an important role in supporting statewide climate change goals. State agencies are currently drafting criteria around meeting the climate change goals, and many aspects of implementation have not been met yet. As such, it is a key time for CDE to get involved in the discussion.

To help the state meet the requirements of California’s climate change legislation, we recommend adding an eighth standard that declares:

“Educational facilities planned by school districts shall be:
   h. Located and designed in a manner that supports California’s Climate Change goals as set forth in AB 32 and SB 375.”

By addressing sustainability at the very beginning of Title 5, the document will immediately establish the importance of meeting California’s climate change goals, which in turn encourages healthy school siting. In addition, we recommend the standard be supplemented by providing information about AB 32 and SB 375 in the appendix, particularly as it connects to automobile emissions related to accessing the school site. AB 32 and SB 375 aim to curb climate change by reducing greenhouse gas emissions associated with automotive travel. The bills seek to promote more efficient land use planning that will reduce vehicle miles traveled (VMT).

Where a school is sited directly relates to the amount of VMT in a region. If a school site is located far from where students live and/or lacks connections that are safe for pedestrians and bicyclists, parents are more likely to drive their children, resulting in
a large amount of VMT associated with accessing the site. In a 2005 study, the Centers for Disease Control and Prevention found that long distances between home and school was the number one reason why children were not walking to school\textsuperscript{1}. Parent perceptions of traffic danger were a distant second. Both reasons relate to where a school is sited. Further, reducing VMT is key for reducing small particulate matter that triggers asthma, and in turn impacts absenteeism from unmanaged asthma. While we understand that policies enabling school choice make the travel-to-school VMT issue more complicated, California can maximize the opportunity to reduce emissions by siting schools close to where students live.

Other issues of sustainability related to school siting are explored below. For example, while there is a growing base of information on energy efficient design, preserving existing structures, such as schools, may be the ultimate form of recycling and a wise use of resources, because doing so helps sustain existing neighborhoods and minimizes consumption of additional land and other resources.

**Recommendation 2: Add a standard related to efficient use of public resources.**

To support state agency, local government, and school district fiscal solvency, we recommend adding a standard that states:

\textit{“Educational facilities planned by school districts shall be:}
\textit{i. Designed and located to be an efficient use of public resources and a district shall evaluate existing resources within the district and city/county before a school site location is chosen.”}

With the many billions of dollars invested in school facilities construction statewide, and with California in the midst of massive and unprecedented budget deficit, it is critically important that the state look at every possible opportunity to ensure that funding is used as efficiently as possible – this includes a review of construction, maintenance, and operating costs. Encouraging efficient use of public resources early on in Title 5 strengthens the message that collaboration, joint use of facilities, and full cost accounting of long-term operating costs are important strategies in school site selection.

The goal of such a standard is to encourage districts to look for cost savings by collaborating with cities and counties to choose new school sites that maximize use of existing infrastructure (e.g., roads, public transportation, utilities, water, etc) and to thoroughly study the costs of renovating existing schools versus building new facilities on remote sites. Siting schools near existing infrastructure, such as public transportation or walkable neighborhoods, encourages physical activity, while reducing the costly demand for school funded busing. Students who can walk, bike or take public transportation to school are given an important opportunity to engage in health-promoting activities that can support their well-being and potentially reduce diabetes and obesity-related absenteeism. The CEFPI guide \textit{A Primer for the Renovation/Rehabilitation of Older and Historic Schools}\textsuperscript{2} does a good job of outlining often overlooked costs that need to be considered when making a decision
to renovate versus replace. Recommendations follow that expand upon these aspects in more detail.

§ 14010. Standards for School Site Selection

**Recommendation 3: Explore alternatives to minimum acreage recommendations.**

Under the list of exceptions to net usable acreage in subsection a., we recommend including an exception that highlights the local flexibility already inherent in Title 5. For example, if the district prefers smaller schools or sites based on a local preference for school culture, social relationships, or community connections, it would be beneficial to illustrate here the flexibility in the code. At a minimum, we ask that CDE reinforce this concept by moving subsection u., which describes exemptions, to subsection a.

In our January 31, 2008 memo, we recommended dropping minimum acreage recommendations altogether because these standards inhibit local flexibility in siting and design. These standards often force districts to look for remote sites (that increase VMT, reduce walking and bicycling, and increase land consumption) to find enough acreage to meet the standards. This remains an issue we’d like to explore. We understand that site size is linked to educational programming, but note that in our March discussion with your staff, it was mentioned that a majority of school sites are being approved at less than the recommended acreage. As such, it seems worth exploring the value of a state-recommended minimum acreage policy if many districts apparently do not wish to build new schools on such large sites and are able to regularly demonstrate that they can deliver the required educational programming on smaller sites. In addition, while some schools have sought and been granted exceptions, others retain the assistance of consultants when evaluating school site possibilities, and at times these professionals do not cite the exceptions and instead create an impression that the minimum acreage standards are required for receiving state aide. It also makes sense professionally for California to mirror the recommendations of the national professional organization on school facilities, the Council of Educational Facility Planners International (CEFPI), which no longer encourages minimum acreage recommendations or requirements.

Our concern with school site size is tied to where a school is located, and how that works for or against local sustainable development. The larger the required acreage, the more difficult it often becomes to find enough space within or close to existing or planned communities. This translates into it being easier to locate new schools on the fringe or on remote sites, which in turn requires that additional infrastructure be built (e.g., roads, utilities) to reach the site and also makes it more difficult and sometimes impossible to access on foot or bicycle. Both outcomes likely increase VMT, increase greenhouse gas emissions, and contribute to rapid and low-density land development. These negative impacts relate to Recommendations 1 and 2.
Recommendation 4: Include bicycle and pedestrian access issues to list of circumstances that may impact acreage.

Pedestrian and bicycle access is a critical aspect of Healthy School Siting. We recommend modifying section a.4 to acknowledge its importance in school siting decision-making as it relates to acreage:

“Geographic barriers, traffic congestion, unsafe conditions for those who walk or bicycle to school, or other constraints would cause extreme financial hardship for the district to transport students to the proposed school site.”


Subsection k. references the 1990 version of the California Highway Design Manual. The manual was updated in 2007 and is available on the Department of Transportation website:


We fully support that the siting standards in this section address safety first and foremost. Subsection l. in particular describes common pedestrian and bicyclist challenges (e.g., wide arterial streets with heavy traffic and limited options to safely cross the street). Ensuring that children can walk and bicycle to school is an important part of having a healthy and self-sufficient student body, reducing busing costs, as well as reducing VMT. Subsection l. incorporates the 1987 School Area Pedestrian Safety manual published by the California Department of Transportation. The manual was updated in 1996, and there are additional, more recent resources that could also be cited here, such as these Federal Highway Administration web resources:


Recommendation 7: Add clarity to subsections that address how a site relates to the surrounding community.

Subsection o. states that “the site shall be selected to promote joint use of parks, libraries, museums and other public services…” Subsection p. states that “the site shall be conveniently located for public services including but not limited to fire protection, police protection, public transit and trash disposal whenever feasible.” Both subsections are similar in that they do not include a test of whether or not the “shall” has been met, unlike the requirements found in other subsections.

We recommend that a metric be added for each subsection that requires districts to contact and communicate with cities or counties, which would encourage early discussion and collaboration, as well as reporting back on meeting requirements. As referenced in section 14011, subsection e., Education Code 35275 states that communication related to joint use should happen, but it lacks specifics on when and
how. A potential test for subsection o. could be a checklist that requires reporting city/county identified needs or assets that could be shared through a joint use partnership. The checklist would be tied to the list of educational programming needs, such as theatres, recreational centers, and athletic fields. Such a list could acknowledge facilities that meet the Field Act and those that might with additional work, and the list could be regularly maintained by a district or updated when a new school is being planned.

As referenced in section 14011, subsection f., Public Resource and Government Codes require that districts provide written notice that relates to the availability of existing or planned public services. However, a more detailed discussion would help ensure higher quality communication. For subsection p., a checklist could report which of the essential public services are already in place or planned at the location desired. Checklists for subsections o. and p. would translate into a more detailed conversation with local government agencies at an early stage and provide a metric more in line with other subsections.

In addition, the code discusses fire, police, and similar services, but should also address infrastructure such as roads, sidewalks, street crossings, and utilities. Design Guidelines for Pedestrian-Friendly Neighborhood Schools, developed for the City of Raleigh, NC, includes an excellent checklist that addresses public services and infrastructure that children need to safely walk or bike: http://www.raleighnc.gov/publications/Planning/Guides_Handbooks_and_Manuals/School_Design_Guidelines.pdf


Section 14010, subsection u. clarifies that exemptions from any of the standards are possible. As noted in Recommendation 3, we recommend this exemption statement move to the front of the section to be made more explicit. Additionally, local school district planning would be enhanced if CDE would provide examples of when exemptions are appropriate and how mitigations can be met. In addition to reiterating Title 5, the guidance documents should contain more illustrative examples of schools that have met the established standards and those that have had approved exemptions. It would also support healthy school siting if additional contextual exemptions were spelled out, for example, if the district prefers smaller schools or sites based on a local preference for school culture, climate, social relationships, and community connections. We recommend that case studies involving approved exemptions be included in related guidance documents and that Title 5 reference those examples where they are available. We are willing to help with the identification and preparation of appropriate case studies.
Recommendation 9: Clarify local government-related requirements.

Subsections e. (explore joint use) and f. (written notice to local planning agencies) are critical to healthy school siting, and we are very pleased that they are included. However, it would be helpful to add clarity to ensure that quality communication between school districts and local government agencies on school siting occurs. We understand that school districts have the authority to overrule local land use plans created by local governments, but we believe that districts could develop better relationships with residents and local governments by having more in-depth discussions, which in turn could lead to higher-quality outcomes such as efficiently-designed new schools and neighborhoods. As noted in Recommendation 7, having CDE require the completion of a checklist would help frame the discussion between school districts and cities, and additional detail provided by CDE on how to most effectively communicate could be included in the guidance documents.

Recommendation 10: Explore standards that impact student health with additional discussion and case studies.

A number of standards in this section have important implications for healthy school siting, in particular subsection a. number 4 (community functions that may affect the school design), subsection b. number 3 (vehicle traffic pattern does not interfere with foot traffic patterns), and subsection c. number 4 (joint use for educational purposes with other public agencies is explored). Each aspect should be detailed further as to what it means to meet the standard - for example “explored” in subsection c. number 4 is not a very clear directive. The two checklists described in Recommendation 7, one for evaluating joint-use and the other to evaluate infrastructure, could be used to add clarity to these standards.

Providing case studies in the guidance documents, as we note in Recommendation 8, would add needed clarity to issues related to community functions and joint use, and visuals that address vehicle traffic patterns, pedestrian entryway and crossing design would help ensure that such oft-misunderstood elements are designed and built to maximize student safety and encourage walkability.

Recommendation 11: Needs of bicyclists should be addressed.

The needs of bicyclists and pedestrians differ in terms of safe access. Subsection b. should also include a consideration of the safety aspects of access to the site by bicycle. Safe and accessible bicycle storage is an important part of encouraging children to use this healthy form of transportation, and subsection f. should include
“providing secure and accessible bicycle parking on site” under the list of factors to consider when evaluating the placement of buildings.

**Recommendation 12: Encourage existing Title 5 flexibility by providing case studies involving approved exemptions.**

Within Title 5, subsection r. (exemptions) could be moved to the top of section 14030 to emphasize the flexibility that is inherent in Title 5. Similar to our other suggestions, this recommendation involves providing case studies in the guidance documents, as it would be useful for districts to see how challenges have been met in existing communities.

§ 14032. Plan Approval Process for State-Funded School Districts

**Recommendation 13: Add requirement that preliminary plans include a map to illustrate travel and access relationships.**

Preliminary plans submitted should also include a local area map showing the proposed school site in context to existing and planned neighborhoods that will be served by the school. The map should illustrate travel and access relationships between the site and neighborhoods. This allows the site and/or neighborhood design to be analyzed with regard to access, safety, and circulation issues.

§ 14035. Abandonment of Inadequate Facilities

**Recommendation 14: Reframe statements to encourage full consideration of renovation versus replacement.**

We recommend that the language around renovation versus new construction be reframed. This section could be moved to the beginning of Title 5 and start with a statement such as:

“Renovating existing schools can cost less than building new, and generally uses less energy resources. As such, when renovating allows school districts to continue to meet academic goals, CDE encourages exploring renovation over building new. If abandonment of inadequate facilities is being requested, the district shall provide the evidence in support of this request, subject to review by the California Department of Education. Assessment of facilities to be abandoned are to be conducted by professionals with experience in older/historic buildings.”

The goal is to ensure that districts are making best use of available resources and to stress that this evaluation should happen first and foremost. Other states with experience reviewing district-submitted renovation cost arguments found that once the state does an analysis and applies the rigor required, they frequently find that renovation is more cost effective than new construction. In Pennsylvania, cost data was analyzed and it was determined that the average cost, per square foot, of new
schools is nearly twice the cost of renovations and additions if all project costs are considered. It was found that if districts were using consultants unfamiliar with renovation and preservation, that rehabilitation costs were often overestimated. In addition, costs of providing necessary infrastructure and public services, as well as the cost to transport students was often unaccounted for or underestimated. An analysis in Michigan revealed that in every case studied, building a new school cost more than renovating an older one.\(^3\)

To help school districts better analyze the costs associated with renovation and new construction, we recommend that CDE include a checklist with all of the costs that should be examined. This checklist should include costs for new construction such as building roads and providing utilities to access the new school, as well as ongoing transportation costs. The CEFPI guide *A Primer for the Renovation/Rehabilitation of Older and Historic Schools*\(^4\) includes an excellent list of significant “hidden costs” that must be considered, including:

- Utility extensions and other infrastructure charges (permits, sewer fees, etc.)
- Site development costs, particularly those paid by municipalities or other units of government
- Review fees related to environmental regulation and testing
- Capital and operating costs related to busing
- Required roadway extensions and improvements
School Site Selection and Approval Guide (Blue Book)

General Comments

**Recommendation 15: Merge the School Site Selection and Approval Guide (Blue Book) and the Guide to School Site Analysis and Development (Yellow Book).**

The two documents that interpret Title 5 and provide additional detail could be combined and rewritten to better convey Title 5 regulations and intent to local school districts. A single, unified document would better communicate CDE goals and articulate consistent themes, such as the flexibility inherent in Title 5, the established link between siting, design, and learning, and the promotion of joint use and innovative design to improve learning and close the achievement gap. One comprehensive document with increased clarity would also be more user-friendly for school districts. As noted earlier, we recommend that this document contain a series of case studies on approved and built schools, including ones that met standards and ones that obtained exemptions, to illustrate Title 5’s flexibility.

**Recommendation 16: Reorganize discussion to reflect local process**

Building on Recommendation 15, if the Blue and Yellow book are merged, a discussion of siting policies might be best organized around what the process should look like at the district level:

1) Articulate educational and community program requirements that must be met in public school facilities and on public school grounds.

2) Establish standards for the building and grounds requirements for schools by grade levels, enrollment size, and program type, and for community uses that are in accordance with the educational and community program requirements. Also include standards for sites as it relates to brownfields and when structured parking would be desirable.

3) Evaluate how well current facility and grounds conditions and community resources measure up against the approved standards.

4) Determine through a public process how to change existing conditions to desired ones. For example, evaluate options for new construction, modernization, expanding existing schools, building new schools.

5) If a determination that a new school and new location for a school is needed, then:

   a) Articulate educational and community program requirements for the particular school, projected size and community it is slated to serve.
b) Identify specific standards and best practice for facilities and grounds that align to the educational and community needs of the site, specific to the school.

c) Utilize site specific standards, programs, and best practice to determine site location, size, and quality requirements.

Recommendation 17: Ensure all standards in Title 5 receive detailed discussion.

The Blue Book contains much detail on the standards for school site selection in Title 5 (14010). However, two subsections warrant more content to be communicated effectively - (p) location of public services, and (s) costs to be considered including bringing utilities to site. Most of the other subsections of 14010 are explored in depth, and subsections p. and s. need to be explored in detail as well, as both issues have cost and implementation implications for all involved.

It is important to provide additional detail so as to help ensure that true costs are included as part of the cost accounting, and to encourage that sites are in-line with existing community plans to the highest degree possible so that school plans and community plans can be complimentary and provide the most overall efficient use of public funds. This is particularly important now with the passage of SB 375, regions within the state will be provided with greenhouse gas emissions caps; transportation and housing plans will need to be coordinated to reach these goals. School construction is directly linked to housing development trends, so school districts should be involved in considering the greater community planning efforts when selecting sites.

Selecting the Proper Site

Recommendation 18: Encourage districts to fully evaluate existing resources.

In the introductory paragraph under “Selecting the Proper Site,” we recommend including language that emphasizes thorough assessment of existing facilities and their ability to be renovated, expanded, or repurposed to accommodate enrollment growth before pursuing new sites. Also recommended is the development of a new checklist of existing resources, which can be used as a worksheet for locals, and provided to the state to substantiate their decision. And if a new school is being considered to replace an existing facility, language should encourage school districts to first consider locating the new facilities on the old site before deciding to build on a new site. Specific language is provided under Recommendation 11.

Recommendation 19: Increase emphasis on site selection team process.

In the section, “Determining who will select the site,” the guide suggests using a “selection team” process as opposed to a staff-only process, which we applaud. However, we recommend stronger language in support of the community process,
which leads to the greatest accountability and transparency. The list of potential members includes “public officials,” which should be defined more clearly and include city managers, county administrative officers, municipal planning, and public works staff. We also recommend the inclusion of resident member parents on such a committee.

### Developing Site Selection Criteria

**Recommendation 20: Update reference to CEFPI.**


**Recommendation 21: Provide more information on the opportunities in joint city or county planning processes.**

The “Recommended Resources” section wisely suggests that districts review city/county general plan and land use maps for designated school sites. Working with cities and counties during their general plan updates and other community planning processes can help schools achieve their desired outcomes in tandem with communities. Similarly, involving city and county leadership and staff in school facility master planning can build collaboration and lead to outcomes that work well for all. A survey conducted by the California Center for Physical Activity in 2007 (not yet published) found that both respondents from the California School Board Association and League of California Cities support this positive outcome.

As such, we recommend adding language to indicate that “city and county officials should be invited to participate in school district planning efforts with relating to school siting.” We are also encouraging cities and counties to make sure that school leaders are invited to participate in their planning efforts as well.

**Recommendation 22: Include additional information related to impacted sites and allowable site size flexibility.**

The “Impacted Sites” section discusses when school sites smaller than the CDE recommended acreage is appropriate. While we agree that appropriate educational programming must be delivered, we recommend exploring other situations when smaller sites may be a chosen option for a community. For example, if the district
prefers smaller schools or sites based on a local preference for school culture, climate, social relationships, community connections, or spatial proximity, the school should be permitted to proceed with applying for the exemption, and have examples of other sites that have been approved that are similar. Potential negative impacts of minimum acreage policies are also relevant in rural settings, as documented in the Rural School and Community Trust document *Land for Granted:*

http://www.ruraledu.org/site/c.beJMIZOCIrH/b.1000941/k.E60B/Land_for_Granted_The_Effects_of_Acreage_Policies_on_Rural_Schools_and_Communities_link_to_PDF/apps/s/link.asp.

We recommend that case studies involving urban and non-urban exemptions are included.

**Evaluating Safety Factors**

**Recommendation 23: Discuss Title 5 statements related to pedestrian access.**

The section “Traffic and School Bus Safety Considerations” addresses site layout considerations related to bus access, but does not address all of the elements cited in Title 5 14030, subsection b. In particular, there is no discussion in this guide about factors listed in Title 5 that have a major impact on pedestrian and bicycle access:

1. Vehicle traffic pattern does not interfere with foot traffic patterns. Foot traffic does not have to pass through entrance driveways to enter school. Crosswalks are clearly marked to define desired foot path to school entrance.
2. Parking stalls are not located so vehicles must back into bus or loading areas used by parents. Island fencing or curbs are used to separate parking areas from loading/unloading areas.

These aspects can be misunderstood and the documents could help by providing some clear illustrations of well-designed access that meets the California Department of Transportation’s “Complete Streets” goals of providing safe access for all users: http://www.calbike.org/pdfs/DD-64-R1.pdf. There are a number of pedestrian and bicycle design experts in California that could help make such images possible; we recommend that CDE work with Caltrans to provide these illustrations and appropriate web links.

**Recommendation 24: Update section on Safe Routes to School.**

The section “Safe Routes to School” should be updated. We recommend replacing the first paragraph with the following:

“Safe Routes to School is a national (and international) movement to make it safe, convenient, and fun for children to bicycle and walk to school. The program improves routes to schools through providing funding for the installation of sidewalks, bike lanes, pathways, crosswalks, traffic calming, etc. Safe Routes improves community and personal health, benefits the
environment, increases safety, and helps to decrease traffic congestion around schools. A 2007 study by the California Department of Transportation showed that schools that received Safe Routes to School benefits in California showed increased walking and bicycling in the range of 20 to 200% and safety increases of up to 49%. Nationally, only about 33% of students live within two miles of a school – down from 50% in 1969. Because the physical environment and the distance students live from school greatly affects how many residents can and will walk, a Walkability Checklist is provided in Appendix I. A growing number of communities are implementing measures to make their environments safer for walking and bicycling.”

Note that the National Safety Council’s checklist has been updated since the 1998 version referenced in the Blue Book. A recent USDOT-approved checklist can be found here: [http://www.saferoutesinfo.org/resources/education_walkability-checklist.cfm](http://www.saferoutesinfo.org/resources/education_walkability-checklist.cfm) and should also be updated in the appendix.

In the third paragraph, the guide mentions the possible availability of Safe Routes to School funding. We recommend making clear that this valuable resource should not be seen as a potential mitigation when selecting a site. The program is meant to correct past mistakes at existing schools - new schools need to be planned to ensure safe access when locating and designing facilities. However, Safe Routes to School funding could be a possibility for creating improvements when determining costs of renovation. In addition, state funding is currently only available based on inclusion annually in the state budget.

Choosing Appropriate Sites for Joint-Use Facilities

**Recommendation 25: Expand discussion on joint-use.**

This section features excellent discussion about local government collaboration for joint use school sites, and additional text may help encourage districts to fully explore joint use options when they are looking to site new schools. We recommend CDE add language on the importance of building healthy relationships with local government agencies and provide suggestions for doing so (e.g., setting up regular “2x2” committees, establishing a local “city-school committee,” and/or inviting municipal planners to sit on facility master plan teams and having school district representatives sit on municipal general plan update committees). It would also be helpful to highlight collaboration barriers for school districts to be aware of (e.g., liability concerns, Field Act requirements) and provide information that shows that such barriers can be overcome.

As mentioned in the Title 5 discussion, we recommend a checklist that helps districts assess city/county and other agencies needs and assets as they relate to educational programming that could benefit from a joint-use partnership. A checklist for conducting a joint-use needs and asset assessment could be detailed and explained in this document.
The document lists examples of successful joint-use by location and facility type, but it is unclear about where to go for more information. The examples listed should be updated and expanded to provide additional details or include links to where local districts can go to learn more from these cases.

Observing CEQA Requirements

**Recommendation 26: Discuss the impact of recent state legislation related to greenhouse gas emissions.**

This section is a good place to provide information about California’s landmark legislation to reduce greenhouse gas emissions to 1990 levels by 2020 (AB 32) and legislation that requires analysis of impact of land use on climate change (SB 375). These state policies establish a new framework for all land use decisions throughout the state. Analyzing impacts such as VMT and related emissions early on will help districts determine the most appropriate school sites and the impacts should be explored in detail in the CEQA documents.

Recognizing Land Use Issues

**Recommendation 27: Encourage collaboration with local government on school site selection.**

This section presents a key opportunity to encourage joint planning and collaboration with local governments, which will be even more important now that regions will need to meet state goals for greenhouse gas reductions under SB 375. Early and continued communication with city and county leaders is critical to ensure that school sites work well for communities. It would be helpful for CDE to point out the resources local governments have that might help their school siting efforts as well, such as the ability to assist in developer negotiations, share visions within community-developed plans, provide related mapping data, as well as provide additional planning and engineering expertise and input.

Two forums and discussions conducted by members of the Coalition (CC&S Forum on Building Schools, Building Communities - [http://citiesandschools.berkeley.edu/reports/Building-Schools-Building-Communities-CA.pdf](http://citiesandschools.berkeley.edu/reports/Building-Schools-Building-Communities-CA.pdf), & the LGC Forum on School Siting Collaboration [http://lgc.org/freepub/docs/community_design/reports/sacramento_school_siting_forum_may2008.pdf](http://lgc.org/freepub/docs/community_design/reports/sacramento_school_siting_forum_may2008.pdf)) indicated that communicating as early as possible was a key to success, as well as having an understanding that different entities can have unique legislation and policies and related timelines that they must follow.
Appendix A: Site Selection Process

Recommendation 28: Add and clarify site selection criteria.

The Appendix, Site Selection Process - Part 1 could be strengthened by clarifying some of the items that relate to healthy school siting, and adding some additional criteria.

Under Safety, revise the first criteria to:
“Adjacent to or near roadways with high traffic volume or speeds”

Under Location, revise first criteria to:
“Safe walking areas between site and residential neighborhoods (complete walkability checklist to assess)”

Under Environment, add criteria:
“Transportation alternatives (transit/sidewalks/bike lanes) are available”

Under Size and Shape, revise first criteria to:
“Compatible with the educational program”

Under Size and Shape, add criteria”
“Reduced parking needs due to community context (share facilities, transit/pedestrian/bicycle infrastructure)”

Under Accessibility, revise fifth criteria to:
“Routing patterns for foot traffic are on streets with speeds less than 35 mph”

Under Accessibility, add three criteria:
“Pedestrian accessibility – sidewalks, street crossings, lighting, shade
Bicycle accessibility – bicycle lanes, routes, or trails
Transit accessibility – subway/bus/train routes, stops”

Under Cost, add criteria:
“Costs not deferred to city or county without consent”
Guide to School Site Analysis and Development
(Yellow Book)

General Comments

See Recommendation 15: Merge the School Site Selection and Approval Guide (Blue Book) and the Guide to School Site Analysis and Development (Yellow Book).

Introduction

Recommendation 29: Continue to include explanations of why revisions have been made.

The introduction is particularly well written and helpful for understanding why changes have been made to site size recommendations. We recommend that in updating the Yellow Book (and potentially merging it with the Blue Book), CDE continues to provide this type of high quality information, especially relating to the recommendations we have provided here (e.g., the relationship between new schools and California’s climate change legislation, the nationwide efforts to reduce childhood obesity, an increased understanding of the need to provide multi-modal transportation systems, and the need to increase local agency collaboration to make the most of ever-decreasing resources).

School Site Requirements

Recommendation 30: Provide more detail about flexibility to deal with unusual site conditions.

We recommend that the section “Unusual Site Conditions” include case studies about how schools met these challenges and still provided the appropriate educational programming. This is an opportunity to encourage flexibility. If recommendations from this document about expanding the criteria for exceptions to include more context-sensitivity are taken, this is where more details and case studies should be provided.

Development of the Site Master Plan

Recommendation 31: Address opportunities for physical activity through Joint-use and Safe Routes to School approaches.

The section “Land for Outdoor Physical Education” makes clear that the physical education program of a school is the most influential factor in the determination of the amount of land necessary for a school site. This section should contain information from CDE’s recent report “Healthy Children Ready to Learn”
(http://www.cde.ca.gov/eo/in/se/yr05healthychildrenwp.asp) on joint-use schools as a mechanism to meet physical education space needs. It should also point to the value of Safe Routes to School in providing children with daily activity in the trip to and from school by foot or bicycle. Many school districts now include Safe Routes to School in their Wellness Policies as a way to reach physical activity goals, and there are national surveys that can be used to document walking and bicycling trends. It is important to note again here that increased physical activity has also been shown to promote better student achievement.

Land for Parking and Access Roads

Recommendation 32: Provide additional information on parking standards, flexibility, and related mitigation.

This section provides an acreage calculation, but it is unclear how these numbers were determined. It is worth noting that many city and county parking standards were never established on research, but adapted from other communities without regard to context or evaluation. Many jurisdictions are now re-evaluating their parking standards, and in some cases setting maximum parking standards. A rigorous analysis may have been applied already to the recommendations in this document, but it is unclear to the reader.

In addition, an analysis of parking needs should consider how pedestrian, bicycle, and transit friendly the site is. For example, if increased roles for parent volunteers are cited as a reason for more acreage, then a well-chosen site that is located within communities and with safe walking and bicycling routes can be an effective tool to reduce the parking need, as well as related emissions and VMT. We recommend that language be added that suggests school districts “analyze pedestrian, bicycle and transit accessibility of the site when determining parking needs.” Parking can also be joint-use – for example, Maine allows school sites to share parking with adjacent businesses. In addition, covered bicycle parking should be stipulated at schools, with recommendations about the type and amount of bicycle parking that should be required.

Layout of Facilities

Recommendation 33: Provide information on multi-story and other reduced acreage design innovations.

The section on “Layout of Facilities” provides extensive detail about dimensions and layouts but does not include discussion on more dense alternatives, including multi-story facilities. To encourage more efficient use of land and adaptability to fit within existing communities, we recommend including tables, diagrams, and other information on multi-story school facilities.
Procedures for Developing a Site Plan

Recommendation 34: Include recommended pedestrian and bicycle infrastructure in sample diagrams.

The site plan included in Step 4 of the section on “Procedures for Developing a Site Plan,” should include basic pedestrian amenities. For example, more clearly indicating sidewalk locations, bicycle facilities, pedestrian entryways, pick up and drop off zones, street crossings, and speed limits would further encourage school districts to include these in their own plans.

Appendix on Site Requirements for Very Large Schools

Recommendation 35: Re-title section to reflect discussion on schools of all sizes.

The appendix title implies it is about very large schools, but it is more of a discussion on size in general, including small schools. Renaming the section would ensure all users give it the attention this important section deserves. We recommend something along the lines of “Discussion on the Impact of Site Size.”

Recommendation 36: Move appendix to more prominent portion of guidebook.

The appendix is an excellent discussion of the issues related to school site size. We recommend that this discussion move to the main body of the guidebook, perhaps even at the very front of the document. For example, the following comments currently included in the appendix are critical for all involved to understand at the earliest possible stage:

“Size per se is not the only factor or the most crucial one in determining a school's success. Other factors to be considered are the district's geographical characteristics, its tradition and history, the density and location of its student population, and local politics.”

“A close relationship between the school and the home improves the school's efficiency. Very large schools impede close understanding and cooperation between school and home; they also often involve several communities whose characters and educational needs differ.”

These and other well-thought out statements point to importance of encouraging flexibility and the value of local context.

RE: California Department of Education and Healthy School Siting Policies

Indexed Summary of Recommendations by Category

**Encouraging Local Flexibility**

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Recommendation 8: Explore exemptions in detail in guidance documents (e.g., School Site Selection and Approval Guide, and Guide to School Site Analysis and Development) (pg 7)

Recommendation 12: Encourage existing Title 5 flexibility by providing case studies involving approved exemptions (pg 9)

Recommendation 22: Include additional information related to impacted sites and allowable site size flexibility (pg 13)

Recommendation 30: Provide more detail about flexibility to deal with unusual site conditions (pg 18)

Recommendation 32: Provide additional information on parking standards, flexibility, and related mitigation (pg 19)

Recommendation 33: Provide information on multi-story and other reduced acreage design innovations (pg 19)

Recommendation 35: Re-title section to reflect discussion on schools of all sizes (pg 20)

Recommendation 36: Move appendix to more prominent portion of guidebook (pg 20)

**Encouraging Safe Routes to School**

Recommendation 4: Include bicycle and pedestrian access issues to list of circumstances that may impact acreage (pg 6)

Recommendation 10: Explore standards that impact student health with additional discussion and case studies (pg 8)

Recommendation 11: Needs of bicyclists should be addressed (pg 8)

Recommendation 13: Add requirement that preliminary plans include a map to illustrate travel and access relationships (pg 9)

Recommendation 23: Discuss Title 5 statements related to pedestrian access (pg 14)

Recommendation 24: Update section on Safe Routes to School (pg 14)

Recommendation 28: Add and clarify site selection criteria (pg 17)

Recommendation 31: Address opportunities for physical activity through Joint Use and Safe Routes to School approaches (pg 18)

Recommendation 34: Include recommended pedestrian and bicycle infrastructure in sample diagrams (pg 20)
Deepening School-Community Relationships, Including Joint-Use
Recommendation 7: Add clarity to subsections that address how a site relates to the surrounding community (pg 6)
Recommendation 9: Clarify local government related requirements (pg 8)
Recommendation 21: Provide more information on the opportunities in joint city or county planning processes (pg 13)
Recommendation 25: Expand discussion on joint-use (pg 15)
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Tailoring School Siting Policies to Support California’s Climate Change Goals
Recommendation 1: Add a standard related to meeting California’s climate change goals (pg 3)
Recommendation 26: Discuss the impact of recent state legislation related to greenhouse gas emissions (pg 16)

Ensuring Efficient Use of Public Resources
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Reorganizing and Updating CDE Policy Documents for Accuracy and Clarity
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Recommendation 6: Update reference to School Area Pedestrian Safety Manual (pg 6)
Recommendation 15: Merge the School Site Selection and Approval Guide (Blue Book) and the Guide to School Site Analysis and Development (Yellow Book) (pg 11)
Recommendation 16: Reorganize discussion to reflect local process (pg 11)
Recommendation 17: Ensure all standards in Title 5 receive detailed discussion (pg 12)
Recommendation 20: Update reference to CEFP (pg 13)
Recommendation 29: Continue to include explanations of why revisions have been made (pg 18)