

January 31, 2008

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

RE: Revising CDE School Siting Policy Documents

Dear Superintendent O'Connell:

We are writing because of the opportunity that the State of California has to improve schools and their communities through effective school siting. We understand that under Kathleen Moore's leadership, the School Facility Planning Division (SFPD) is beginning to review their regulations concerning school site selection and planning. While we realize it is early in the process, we wish to offer our thoughts and recommendation on these important policies (i.e., Title 5, the School Site Selection and Approval Guide (Blue Book) and the Guide to School Site Analysis and Development (Yellow Book)). We appreciate Ms. Moore's willingness to re-examine this important issue, a move echoing your insightful remarks in your recent State of Education Address, *"Too often we sit here in Sacramento demanding change and improvement from schools and districts while not being willing to also look critically at ourselves. A continuous learning system means that the state, too, must continually evaluate itself, review the programs and formulas we put out and, if they are not working, change or eliminate them."*

The location of a school has a tremendous impact on students, teachers, families, neighborhoods, and the learning environment, yet new schools are often sited where they do not fully support healthy children and communities. One unintended consequence is schools physically disconnected from neighborhoods. Research has shown that the average distance between where children live and where they attend school has increased, which has contributed to the drastic decline seen in walking and bicycling to school. Nationally, only about 35 percent of students live within two miles of a school – down from 50 percent in 1970. Studies show that, in some areas, up to 25 percent of morning rush hour traffic is from parents driving children to schools. As California continues to grow and more schools are built, these trends are likely to be seen throughout our state and will work against the governor's efforts to address climate change.

School siting outcomes have important consequences for schools and communities as Californians continue to invest billions of dollars each year in school construction. Numerous policy, funding, and institutional challenges make it difficult for decision makers to fully consider the impacts of school siting. Examples include the loss of prime agricultural land, suburban sprawl, and prohibiting safe routes to school. These impacts are critical for superintendents, school board members, parents, and school building and facility managers, as well as city and county planners to understand so that they can make better-informed decisions when siting new schools.

We offer this memo in the spirit of helping to advance the goal of creating a world-class educational system in California. We will be contacting Kathleen Moore to discuss our recommendations and how our group may contribute to this important discussion. If you have any questions about this policy brief, please contact Dr. Jeff Vincent, Deputy Director of the Center for Cities & Schools at (510) 642-1628.

Best regards,

The Ad-Hoc Coalition for Healthy School Siting

cc: Kathleen J. Moore, Director, School Facilities Planning Division, Department of Education

The organizations listed below support the attached recommendations:

American Academy Pediatrics, California Chapter 1
Bauman College
Bay Area Bicycle Coalition
California Bicycle Coalition
California Breathing
California Conference of Local Health Officers
California Medical Association
California Park & Recreation Society
CalServes of Sonoma County
Center for Building Science and Performance, National American Institute of Architects
Center for Cities and Schools, University of California-Berkeley
Center for Community Innovation, University of California-Berkeley
Cities Counties and Schools Partnership
Coalition for Sustainable Transportation
Community Action Partnership of Sonoma County
East Bay Bicycle Coalition
Family Action of Sonoma County
Greenbelt Alliance
Richard J Jackson MD MPH, Adjunct Professor, University of California-Berkeley, School of Public Health, Former California State Public Health Officer
Local Government Commission
Marin County Bicycle Coalition
Natural Resources Defense Council
Northern California Center for Well-Being
Prevention Institute
Public Health Law and Policy
Redwood Empire Food Bank
Roseland Children's Health Center
Ryan Snyder Associates
Sacramento Bicycle Advocates
Safe Kids California
Safe Kids Sonoma County
Safe Routes to School National Partnership
San Diego County Bicycle Coalition
Sonoma County Asthma Coalition
Sonoma County Bicycle and Pedestrian Advisory Committee
Sonoma County Bicycle Coalition
Southern California Public Health Association
Strategic Alliance
Transportation and Land Use Coalition
University of California Berkeley Traffic Safety Center
WalkSacramento
WalkSanDiego

How California's School Siting Policies Can Support a World-Class Educational System

*Submitted to the California Department of Education by the Ad-Hoc Coalition for Healthy School Siting,
January 31, 2008*

The California Department of Education (CDE) has an important opportunity to improve school siting outcomes in communities throughout the state with its upcoming revisions to Title 5, School Site Selection and Approval Guide (Blue Book), and Guide to School Site Analysis and Development (Yellow Book). These documents have enormous influence on local school siting decisions, and would benefit from being updated to improve their clarity and to address broader school and community outcomes desired by Californians.

Why is school siting key to a world-class educational system? Effective school siting can:

- **Increase academic performance**
 - Schools sited to encourage walking and bicycling increase students' physical activity levels, which is positively correlated with better academic performance.¹
 - School site size partly determines enrollment size. Numerous studies across the country document the benefits of smaller schools and small learning communities.²
 - Smaller schools that are sited within neighborhoods (and not on a community's outer fringe) have an easier time recruiting parent volunteers; parent engagement is correlated with academic success.³

- **Save money**
 - A school district's transportation budget often represents a significant operating cost. Schools sited to maximize walking and bicycling can minimize the need for school busing and reduce transportation expenses.⁴
 - Schools sited within or directly adjacent to existing neighborhoods reduce expenses for new infrastructure such as roads, water, sewers, and utilities.⁵
 - Schools sited and designed for joint or shared use with local communities, such as parks or libraries, can save school districts money in construction and operation.⁶
 - Schools sited to support joint uses generate strong support from communities - for individual schools and future school construction bonds.⁷
 - Schools sited to promote walking and bicycling require less acreage for parking, reducing land costs.

- **Improve student health and safety**
 - Schools sited to encourage walking and bicycling provide opportunities for built-in physical activity time, helping districts meet physical education goals and federal wellness mandates.
 - Students attending schools where walking and bicycling to school is both safe and within a reasonable distance are more likely to walk and bicycle to school, reducing the number of cars and buses converging at school and reducing the risk of accidents.⁸
 - Schools sited to encourage walking and bicycling decrease congestion around schools, improving relations with neighbors.
 - Schools sited to reduce dependence on automobiles and buses reduce student exposure to unhealthy vehicle emissions. Of particular concern are studies that show that diesel fumes inside California school buses are eight times higher than ambient levels.⁹

- **Increase equity**
 - Siting policies that discourage renovating existing schools and favor building larger new schools can leave older neighborhood schools to fall into disrepair. This disinvestment further contributes to the physical, social, and economic decline seen in many neighborhoods where a large percentage of low-income, African American and Latino students live.
 - In many urban communities, school grounds are the only place for students to get physical activity, and if students and families live within walking distance to a park or playground, they are more likely to participate in physical activity.¹⁰
 - Locating schools within walking and bicycling distance makes it easier for families with limited auto access to better access and participate in their children's school and reduces their transportation expenses.¹¹

- **Increase educational experiences**
 - Schools that are centers of community can provide unique opportunities for children to learn from their local communities and environment.¹²
 - Schools sited to support joint uses increase student, family and community services and amenities.¹³

- **Help meet California environmental goals**
 - Through the passage of AB32, the State of California must lower its greenhouse gas emissions to 1990 levels by the year 2020. The school commute can be an important part of meeting these aggressive targets. Siting schools within walking and bicycling distance will help to decrease greenhouse gas emissions.

CDE can encourage school siting that supports a world-class educational system by considering the following recommendations in revising Title 5, School Site Selection and Approval Guide, and Guide to School Site Analysis and Development:

- **Eliminate site size acreage minimums. Even though these are recommendations, site size minimums become the *de facto* sizes school districts pursue.**
 - Minimum recommendations or mandates for site size create barriers to assessing local needs and siting schools accordingly. State regulations should create a more flexible approach to local site selection that considers the school's function and program requirements to determine site size needs.
 - Many states have done away with their site acreage minimums or increased local flexibility in site sizes. The latest (2004) version of the Council of Educational Facility Planners, International's (CEFPI) school planning guide, *Creating Connections*, no longer contains recommended site size minimums because of the problems they create for local districts. Nationally, at least 22 states do not have minimum acreage guidelines.

- **Encourage school districts to collaborate with local governments. Language in the policy documents should better encourage school districts to collaborate with local governments in order to maximize school siting benefits.**
 - Encourage and support sound planning of school facilities by encouraging school districts to participate in city and county planning processes, and inviting local governments to participate in school district planning processes.
 - Continue to encourage joint use of facilities by highlighting keys to success and best practices.

- **Encourage equal consideration of standards in Title 5. The intent of Article 2 § 14010, subsections “l” through “p”, should be emphasized more in the guidance documents to balance the attention given to other standards.**
 - In Article 2 § 14010, subsections “l” through “p” currently state that a school site “shall” be located to encourage student walking, to promote joint use, conveniently located for public services, and “shall not” be on major streets with heavy traffic patterns; highlighting and encouraging these policy intents will help to ensure that they are fulfilled.
- **Encourage school districts to access resources on school siting.**
 - Reference the wealth of school siting research, information, and best practices collected nationally by the federally-funded National Clearinghouse for Educational Facilities and disseminated for free on their Resource Lists website: <http://www.edfacilities.org/rl>

To conclude, we thank CDE for the opportunity to submit these comments and we look forward to participating in your process of revising and updating your policy documents. As you move forward, we encourage CDE to consider increasing the clarity of the Blue Book and the Yellow Book, perhaps by combining them into one comprehensive document. We also encourage the CDE staff involved in the policy and document revision committee to utilize the information, best practices, and recommendations put forth in the following recent and influential reports:

Building Schools, Building Communities: The Role of State Policy in California. 2007. Center for Cities & Schools, UC Berkeley. PDF download: <http://citiesandschools.berkeley.edu>

Model Policies in Support of High Performance School Buildings for All Children. 2006. Building Educational Success Together (BEST). PDF download: http://www.bestschoolfacilities.org/best%2Dhome/docuploads/pub/173_BESTModelPolicies5_7_07_2.3_Final2.pdf

Schools as Centers of Community: A Citizen’s Guide for Planning and Design. 2003. National Clearinghouse for Educational Facilities. PDF download: http://www.edfacilities.org/pubs/scc_publication.pdf

Schools for Successful Communities: An Element of Smart Growth. 2004. Council of Educational Facility Planners International and U.S. Environmental Protection Agency. PDF download: http://www.epa.gov/dced/pdf/SmartGrowth_schools_Pub.pdf

Travel and Environmental Implications of School Siting. 2003. U.S. Environmental Protection Agency. PDF download: http://www.epa.gov/dced/pdf/school_travel.pdf

¹ Grissom, Jim. April 2005. A Study of the Relationship Between Physical Fitness and Academic Achievement in California Using 2004 Test Results. California Department of Education; Active Living Research. 2007. Active Education: Physical Education, Physical Activity and Academic Performance. Active Living Research Briefing.

² Schnieder, Mark. 2002. Do School Facilities Affect Academic Outcomes? Washington, DC: National Clearinghouse for Educational Facilities.

³ Council of Educational Facility Planners International, Inc. and U.S. Environmental Protection Agency. 2004. Schools for Successful Communities: An Element of Smart Growth. Scottsdale, AZ: CEFPI.

⁴ McClelland, Mac and Keith Schneider. 2004. Hard Lessons: Causes and Consequences of Michigan’s School Construction Boom. Beulah, MI: Michigan Land Use Institute; Kouri, Christopher. 1999. Wait for the Bus: How Lowcountry School Site Selection and Design Deter Walking to School and Contribute to Urban Sprawl. Charleston: South Carolina Coastal Conservation League; Maine State Planning Office. 1997. The Costs of Sprawl. Executive Department, Maine State Planning Office.

⁵ *ibid.*

⁶ Building Educational Success Together. 2006. Model Policies in Support of High Performance School Buildings for All Children. Washington, DC: BEST.

⁷ Chung, Connie. 2002. Using Public Schools as Community-Development Tools: Strategies for Community-Based Developers. Joint Center for Housing Studies of Harvard University, Neighborhood Reinvestment Corporation.

⁸ McDonald, Noreen, C. 2007. Active Transportation to School: Trends Among U.S. Schoolchildren, 1969–2001. *American Journal of Preventive Medicine* 32(6): 509-516.

⁹ U.S. Environmental Protection Agency. 2003. Travel and Environmental Implications of School Siting. Washington, DC: EPA; Natural Resources Defense Council and the Coalition for Clean Air. 2001. No Breathing in the Aisles: Diesel Exhaust Inside School Buses.

¹⁰ Cohen, D. 2005. Proximity of Parks and Schools is Associated with Physical Activity in Adolescent Girls. Active Living Research Conference, San Diego.

¹¹ McDonald, Noreen, C. 2007. Active Transportation to School: Trends Among U.S. Schoolchildren, 1969–2001. *American Journal of Preventive Medicine* 32(6): 509-516.

¹² U.S. Department of Education. 2000. Schools as Centers of Community: A Citizen's Guide for Planning and Design. Washington, DC: U.S. Department of Education.

¹³ Council of Educational Facility Planners International, Inc. and U.S. Environmental Protection Agency. 2004. Schools for Successful Communities: An Element of Smart Growth. Scottsdale, AZ: CEFPI