August 31, 2010

Sacramento County Board of Supervisors
700 H Street
Sacramento, CA 95814

**RE: Draft Public Facilities Element PF-31**

Dear Chair Dickinson and Supervisors:

WALKSacramento believes that school districts could site schools in appropriate locations based on the wording of the PF-31 proposed in the August 31 Public Facilities Element Report Back. Referencing "roadways with adequate capacity" is less restrictive than "arterials and thoroughfares". Stating policy in terms of "should" instead of "shall" is also less restrictive. But what do we get other than to condone school siting practice that may not be in the best interests of students?

Adequate capacity for a high school will be lower than that of a combined middle-high school. Thus, with a district policy to pair middle schools with high schools, higher capacity roadways will be required. The district then has more criteria to site the campus – larger roadways and larger parcels.

If a school must be located along an arterial or thoroughfare, the access and safety of students can be improved by turning the schools back to the major roadway. Creating separate pedestrian/bicyclist and vehicular access points on minor roadways moves the majority of potential crashes to lower speed, lower volume roadways – a preferable environment for teenage drivers and their peers on foot and bike.

One of the many requirements that school districts must meet is the California Department of Education (CDE) requirement for parking to serve a certain number of students, staff, drop off, and several other categories. Policy PF-31 neglects staff, though.

The CDE recommends, generally, that safety is the most important consideration in school site selection. The first safety entry in the CDE Site Selection Criteria worksheet is "Adjacent to or near a roadway with a high volume of traffic". The CDE Walkability Check List asks if there is too much traffic, is the road too wide, traffic signals made wait too long or not enough time to get across, and drivers too fast?

These requirements seem to be at odds with siting schools on major roadways, even if they supposedly provide a benefit to drivers and school district facilities departments. WALKSacramento thinks the policy as recommended by staff is not as
good as it could be but we do not oppose it as it provides school districts the flexibility to do the right thing.

Staff proposed PF-31.  Elementary schools shall **should** not be located along arterials and thoroughfares.  Junior high and high schools shall **should** be located near roadways with adequate capacity and should provide adequate parking to facilitate the transport of students.

**WALKSacramento** encourages people to walk and bicycle in their communities.  The benefits include improved physical fitness, less motor vehicle traffic congestion, better air quality and a stronger sense of cohesion and safety in local neighborhoods.

Thank you for your consideration of these comments and recommendations.  If you have questions or need additional information, please contact me at (916) 709-9843 or cholm@walksacramento.org.

Sincerely,

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