

Richard Cassman

06-4-3



**BUSINESS DEPARTMENT - Business Services**  
**Facilities Development & Planning Branch**  
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April 20, 2006

Clerk of the Board  
Air Resources Board  
1001 I Street, 23<sup>rd</sup> Floor  
Sacramento, CA 95814

Re: Proposed Emission Reduction Plan for Parts and Goods Movement in California

Dear Clerk of the Air Resources Board:

The Long Beach Unified School District ("School District") appreciates the opportunity to comment on the Emission Reduction Plan for Parts and Goods Movement in California ("Plan") proposed by the Air Resources Board.

While the School District was originally established in 1885 with fewer than a dozen students meeting in a borrowed tent, it is now fully responsible for providing school facilities and public education services to more than 95,000 students in 95 public schools in the cities of Long Beach, Lakewood, Signal Hill, and Avalon on Catalina Island. It is the third-largest school district in the state of California and employs more than 8,000 teachers and staff, making it the largest employer in the City of Long Beach.

In addition to establishing high standards of academic excellence for its students, the School District is committed to providing a safe environment and school facilities for its students and employees. Thus, the primary concern in its review of all proposals within the School District is to identify the environmental impacts which must be properly addressed, analyzed, and mitigated to assure an environment conducive to learning.

While the School District commends the board for its continuing efforts to provide the Long Beach Community with healthy air quality, it is concerned that the Plan may potentially have an impact upon students and staff. The Plan, as proposed, does not appear to recognize the unique nature of school facilities under California law. Schools are one of the most protected and heavily regulated land uses. The development of new schools and expansion and modernization of existing schools trigger a myriad of special regulatory requirements for the District that are enforced by a variety of state agencies, which makes finding an adequate school site, and/or expanding an existing school site challenging. These regulations include review and approval by the California Department of Education, the Department of Toxic Substances Control and various other agencies, and often trigger special studies to confirm that stringent health and safety standards are met. Such studies may

involve various agency consultations and oversight and the use of rigorous study protocols. This very high level of review creates great difficulty in constructing school facilities. Therefore, the School District is very concerned that the proposed Plan may subsequently preclude it from upgrading or expanding its schools. These statutorily proscribed site constraints may also make it impossible to find new or replacement school sites in this community after the Plan is implemented. Thus, the School District requests that the Board evaluate the Plan's direct and indirect impacts on school facilities in conformance with the school siting requirements established in Title 5, California Code of Regulations (CCR), the Education Code, and the Public Resources Code.

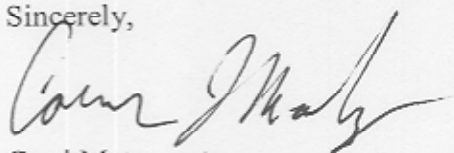
For the Board's reference, Section 14010 of Title 5, CCR contains the following special criteria for potential hazards in the vicinity of school sites which may be relevant to the Plan:

- The site shall be easily accessible from arterial roads and shall allow minimum peripheral visibility from the planned driveways in accordance with the Sight Distance Standards established in the "Highway Design Manual," Table 201.1, published by the Department of Transportation, July 1, 1990 edition, and incorporated into this section by reference.
- The site shall not be on major arterial streets with a heavy traffic pattern as determined by site-related traffic studies including those that require student crossings unless mitigation of traffic hazards and a plan for the safe arrival and departure of students appropriate to the grade level has been provided.
- Existing or proposed zoning of the surrounding properties shall be compatible with schools in that it would not pose a potential health or safety risk to students or staff in accordance with Education Code Section 17213 and Government Code Section 65402 and available studies of traffic surrounding the site.
- The site shall be located within the proposed attendance area to encourage student walking and avoid extensive bussing unless bussing is used to promote ethnic diversity.
- The site shall be selected to promote joint use of parks, libraries, museums and other public services, the acreage of which may be included as part of the recommended acreage as stated in subsection (a) of this section.
- 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.
- The district shall consider environmental factors of light, wind, noise, aesthetics, and air pollution in its site selection process.
- Easements on or adjacent to the site shall not restrict access or building placement.
- If the proposed site is on or within 2,000 feet of a significant disposal of hazardous waste, the school district shall contact the Department of Toxic Substances Control for a determination of whether the property should be considered a Hazardous Waste Property or Border Zone Property.

If the Plan, or any portion thereof, involves the activities described above, then the appropriate study including a level of analysis sufficient to satisfy the state agencies with regulatory authority over the School District must be performed.

Thank you for the opportunity to comment on the proposed Plan. The School District trusts that the Board and the School District can resolve all school facility, student and staff health and safety concerns in a collaborative manner. The School District would be happy to meet with staff to discuss the impact of the proposed Plan on the School District's facilities, students, and staff. If you have any questions or would like to arrange a meeting please feel free to contact me at 562.997.7565.

Sincerely,

A handwritten signature in black ink, appearing to read "Carri Matsumoto", written in a cursive style.

Carri Matsumoto  
Executive Director  
Facilities Development and Planning  
Long Beach Unified School District