



January 28, 2011

School Siting Guideline Comments (MC 1107T)
1200 Pennsylvania Avenue, NW
Washington DC 20460

The Safe Routes to School National Partnership appreciates the opportunity to provide public comment on the draft School Siting Guidelines from the U.S. Environmental Protection Agency (EPA). The Safe Routes to School National Partnership (National Partnership) is a network of more than 500 nonprofit organizations, government agencies, schools, and professionals working together to advance the Safe Routes to School movement in the United States. Our focus is on making it safer and more prevalent for more children to walk and bicycle to and from school and in daily life.

As a member of the School Siting Task Group under the Children's Health Protection Advisory Committee, the National Partnership advocated for the inclusion of language and policies that recognized the positive benefits of siting schools near the children and families served, of ensuring that children are able to walk and bicycle to school, and that state policies and laws support the selection of neighborhood school sites. We are pleased to see that the draft guidelines include so many of our recommendations.

After reviewing the draft guidelines as a whole, we have a number of additional comments. Some comments are supportive of language included in the draft guidelines, and some comments recommend inclusion of stronger or clearer language.

Overall Comments:

- This document is an important new resource for communities and states that are looking for help and expertise in making school siting decisions, and helps pull together the siting considerations for environmental hazards and smart growth all in one place. It will also be helpful to parents and community advocates that are looking for informational resources as they seek to engage in school siting decisions.
- We recommend that the School Siting Guidelines be regularly reviewed and updated, at least annually, by the EPA to ensure their continual usefulness and inclusion of the most current information.
- We strongly support the inclusion of smart growth language throughout the document. It is critical that the current structure of the document, in which smart growth language is interwoven throughout, be retained, given that state and local users are likely to review specific portions of the guidelines rather than reading the document in its entirety.
- The guidelines could use additional language on the academic benefits of neighborhood schools. While this is an emerging field of research, there is already evidence that neighborhood schools improve parent participation and can impact academic performance.

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Ongoing support provided by Bikes Belong. The Safe Routes to School National Partnership is hosted by the Bikes Belong Foundation, a 501(c)(3) nonprofit organization.

- We support the EPA's decision to not set specific buffer zones for contaminants. Buffer zones would make it extremely challenging to site schools in urban areas and have the unintended effect of requiring schools to be built far from existing development. Siting schools in these remote areas can create new environmental hazards from traffic and pollution. Many environmental hazards can be mitigated, and it is critical that local officials have the flexibility to weigh the benefits and risks of a site fully without ruling out sites altogether due to buffer zones.
- We appreciate the EPA's inclusion of robust language on public disclosure and public involvement. It is critical that parents and community members be informed and engaged in the school siting decision-making process, as these decisions affect the environment, the character of the neighborhood, traffic and so much more.
- We appreciate the inclusion of renovation of existing schools in the guidelines, particularly the section on "Is a new school needed" in the Siting Criteria Considerations section. However, in many other sections of the guidelines, renovation of existing school sites is not explicitly called out as an option, and we believe that it should be. Renovating an existing school is often best from a smart growth perspective, uses less resources, is less intrusive to the environment, preserves the neighborhood school and neighborhood character, and may also retain a historic building. It is critical that the final guidelines have more specific references to considering the existing school site and not just new sites for the school. With an elevated role for renovation, these guidelines will also have relevance to existing schools.
- We strongly support the inclusion of recommendations that states and tribes perform a comprehensive review of their laws, policies and regulations that impact school siting decisions. Many state policies are in place, such as minimum acreage standards and renovation reimbursement formulas, which can be a significant barrier to making school siting decisions that align with smart growth principles. As local communities often look to state statute and departments for guidance, and educational funding reimbursements are often tied to state policies, state policy supportive of smart growth principles strongly influences local decisions.
- Overall, the guidelines could benefit from a broader definition of joint use and additional detail about this concept. In the draft guidelines, joint use is positioned as providing students with access to neighborhood and community resources like parks and libraries if the school is sited nearby. However, joint use can also refer to opening school facilities up to neighborhood residents, increasing opportunities for physical activity, community engagement and cost-efficient allocation of community and school funds. Joint use should be explained and recommended more completely in the final guidelines.

Specific Comments:

Comments on specific parts of the guidelines are made with reference to the overall .pdf page number of the .pdf file of the draft guidelines available at <http://www.epa.gov/schools/siting/epaschoolsitingguidelines.pdf>.

- **Frequent Questions, p. 3:** The response to “do the guidelines apply to schools” could use additional clarification. Since the guidelines include renovation of the existing school site as an option in school siting, the guidelines can apply to existing schools.
- **Frequent Questions, p. 7:** The section on “make simple choices on the road” in response to “What can I do to protect my child” should be rewritten to focus more on a comprehensive approach about transportation. Parents should be encouraged to consider whether they can reduce driving and increase walking and bicycling to school. Parents can also be encouraged to start or join a comprehensive Safe Routes to School initiative at their school to make it safer for more children to walk or bicycle to school. If parents are driving near schools, they should be encouraged to drive safely and carefully so as not to endanger children who are walking and bicycling.
- **About the School Siting Guidelines, Overview, p. 9:** The list of factors on pages 9 and 10 should include “impact on the neighborhood.” School location and school facilities can affect the neighborhood’s character, investments, traffic, air quality and more—and this should be explicitly considered.
- **About the School Siting Guidelines, Who Should Use the Guidelines, p. 11:** For the sentence that begins “The guidelines are intended to be applied prior to:” a new first bullet should be added that reads: “before any decision is made about whether to renovate the existing school, build a new school on the current site, or build a new school on a new site.” This will help ensure that these siting decisions include the full range of options available.
- **About the School Siting Guidelines, Principles Behind the Guidelines, p. 11:** We strongly support the inclusion of principle #2, that school siting decisions should help increase the livability and sustainability of neighborhoods and communities. This is an important point to ensure that school siting decisions are not made solely by examining the impact on the students, but rather with attention to the impact of the school location on its surrounding community.
- **Public Involvement, Long-Range School Facilities Plan, p. 17:** The list of items to include in the long-range school facilities plan should include a bullet on school transportation, including estimated rates of walking and bicycling and estimated school busing mileage and costs.
- **Public Involvement, School Siting Committee, p. 17:** The list of potential participants on the school siting committee should also include nonprofits and neighborhood groups. In addition, the fourth bullet under potential roles of the committee should be amended to read “Identify initial candidate sites, including existing school site”.
- **Public Involvement, Public Engagement Points and Strategies, p. 20:** Under the Project Scoping header, the fourth activity should be expanded to read “Review hazards and positive assets.” Under the Preliminary Environmental Assessment header, the fourth activity should be expanded to also include the positive assets and benefits of the site.
- **Siting Criteria Considerations, Overview, p. 23:** We strongly support the inclusion of the location bullets under criteria to consider when evaluating sites for school use. An additional bullet should be added focused on school bus transportation costs for the site. A bullet should also be added to assess the impact of the location on neighborhood revitalization and investment.

- **Siting Criteria Considerations, Before the Siting Process Begins, p. 25:** We strongly support the inclusion of this section in the guidelines as it is important to emphasize that building a new school in a new location is not the only option. The seventh bullet on transportation costs should be clarified as follows: “Consider potential increases in transportation costs *that would come from moving the school to a new site more distant from students including...*”
- **Siting Criteria Considerations, Desirable School Site Attributes, p. 26-28:** We strongly support this entire section on the benefits from applying smart growth principles to school siting decisions. This section could benefit from additional points and clarification in several areas:
 - Adding a discussion of the emerging research on the impact of neighborhood schools on parent participation levels in the school and student’s academic performance
 - Including parks and recreational areas in the list of desirable nearby facilities.
 - Adding a section on joint use that has a clearer and more comprehensive explanation on joint use. Joint use is an important way for schools and communities to share costs and resources to maximize expenditures, engage communities, and expand opportunities for physical activities. The guidelines discuss joint use only from the perspective of schools being able to access nearby community resources such as parks and libraries. However, schools can also sign joint use agreements that open school facilities to community residents outside of school time. When schools are located within neighborhoods, are safe to bicycle or walk to, and have joint use policies in place, community residents benefit greatly in terms of expanded access to school gymnasiums, playgrounds and other facilities.
 - Under the “Consider transportation implications” section, the transportation costs to families should also mention how children from low-income families often do not have the option of being driven to school. These children have higher rates of walking and bicycling to school but are often doing so in unsafe circumstances. The transportation implications for low-income children should be specifically mentioned. It would also be helpful to consider the school bus mileage necessary in any new school site, as additional miles mean additional expense. This can also be examined for parents who drive children to school.
 - Under the “Safe Routes to School” section, the link goes to a dated site that has no mention of the federal funding available to help with Safe Routes to School. The link should be updated to go to www.saferoutespartnership.org and www.saferoutesinfo.org. We also suggest amending the last sentence in the first paragraph as follows: “Other efforts involve implementing changes to existing infrastructure to improve the pedestrian and bike environment so that the routes to school are safer *and more convenient* for school children *and parents.*” In addition, the bulleted list of items to consider should also include: maximizing the presence of low-speed, low-volume streets, adding bike racks, and working with law enforcement to reduce unsafe behaviors by drivers near the school.
- **Siting Criteria Considerations, Table 1, p. 28-29:** We recommend two additions to Table 1, Desirable Attributes of Candidate Sites. The attendance boundary row should mention as a

benefit “reduced bus transportation costs over the long-term”. In the neighborhood access row, “increased safety for students and reduced bus transportation costs” should be mentioned as a benefit.

- **Siting Criteria Considerations, Table 2, p. 31:** For the air pollution row, we recommend adding to the list of potential mitigation options the following: “Traffic calming and Safe Routes to school initiatives to reduce hazards and increase walking and bicycling (N/E)”
- **Siting Criteria Considerations, p. 33:** As mentioned in our overall comments above, we strongly support the EPA’s decision to not include buffer or exclusion zones for hazards. This provides needed flexibility for local communities when balancing challenging decisions about the risks and benefits of different sites.
- **Environmental Review Process, Overview, p. 41:** It would be helpful in the overview section to add language about how an environmental review should also examine the positive assets and environmental benefits of sites. Environmental reviews should not only be focused on assessing the hazards and risks of a site. The final guidelines should include as a key question for the environmental review process the following: “Are there environmental benefits or desirable assets of the site that should be considered?” It may also be helpful to introduce the concept of a “health impact assessment” into the Environmental Review Process section. This will help ensure that the school site’s impact on the health of children and neighborhood residents—whether positive or negative—is fully considered as part of the environmental review.
- **Environmental Review Process, Stage 1: Project Scoping, p. 45-46:** This section should specifically mention renovation of the existing site or building a new school on the existing sites as options. The current language focuses on a new site. This section should also specifically mention consideration of the positive assets of the site. It is mentioned in stage 2, but should also be included in stage 1 to ensure that the positives and negatives are weighed on all sites. Otherwise, a site worth consideration may not be included in the stage 2 assessment.
- **Environmental Review Process, Preliminary Environmental Assessments of Impacts of the Project on the Environment, p. 48:** The list of potential impacts should include an assessment of the vehicle miles traveled by anticipated volume of school busing and parent drop-offs and the resulting impacts on air quality, safety and traffic congestion.
- **Environmental Review Process, Public Comment on the Preliminary Environmental Assessment Report, p. 49:** The list of items to be included in the written notice should include a bullet about the positive assets and environmental benefits of the site.
- **Recommendations for States and Tribes:** We strongly support the language on p. 70-71 and p. 74-76 that encourages states and tribes to conduct a comprehensive review of their policies that affect school siting. Many states have in place laws or regulations that limit the ability of local communities to make school siting decisions that are in line with smart growth principles. It is critical for the future of these school siting guidelines that state and tribal laws and policies support the selection of school sites that are healthy and support smart growth concepts. This language is critical to be kept in the final guidelines.
- **Resource Links by Topic, Smart Growth, p. 108:** For the resource entitled Safe Routes to School National Partnership, we recommend updating the link to our general website at

<http://www.saferoutespartnership.org> as it will give people access to a broader range of resources. We also recommend adding text to describe the National Partnership, specifically: “The Safe Routes to School National Partnership advocates for safe walking and bicycling to and from schools, and in daily life, to improve the health and well-being of America’s children and to foster the creation of livable, sustainable communities.”

- **Glossary:** We recommend adding definitions for the following terms: smart growth, joint use, and Safe Routes to School. A definition for Safe Routes to School could read as follows: Safe Routes to School (SRTS) is a national and international movement to create safe, convenient, and fun opportunities for children to bicycle and walk to and from schools. A comprehensive Safe Routes to School program includes engineering, education, enforcement, encouragement and evaluation. Federal funds are available through state Departments of Transportation to implement Safe Routes to School initiatives.

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Thank you again for the opportunity to comment on the EPA’s draft school siting guidelines. We look forward to working together to strengthen school siting decisions that facilitate neighborhood schools. Please contact us if you have questions about our ideas or would like to discuss them further.

Sincerely,



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